Electric Reliability Organization and Regional Entity Performance Assessment

1. Entity Name:		
		Response Count
		142
	answered question	**142**
	skipped question	**0**

These 142 surveys represent responses from 250 register entities and/or industry stakeholders. All non-responsive or duplicate surveys have been removed from this analysis.

2. Entity Type:			
		Response Percent	Response Count
Registered Entity in NERC Compliance Registry		**90.1%**	**128**
Trade Association or Organized Interest Group		3.5%	5
Regulator: State, Provincial, Federal, or Other		2.1%	3
Other Reliability Stakeholder or Public		4.2%	6
	answered question		**142**
	skipped question		**0**

3. Entity Compliance Registry Code: (Type NA if not applicable)		
		Response Count
		128
	answered question	**128**
	skipped question	**14**

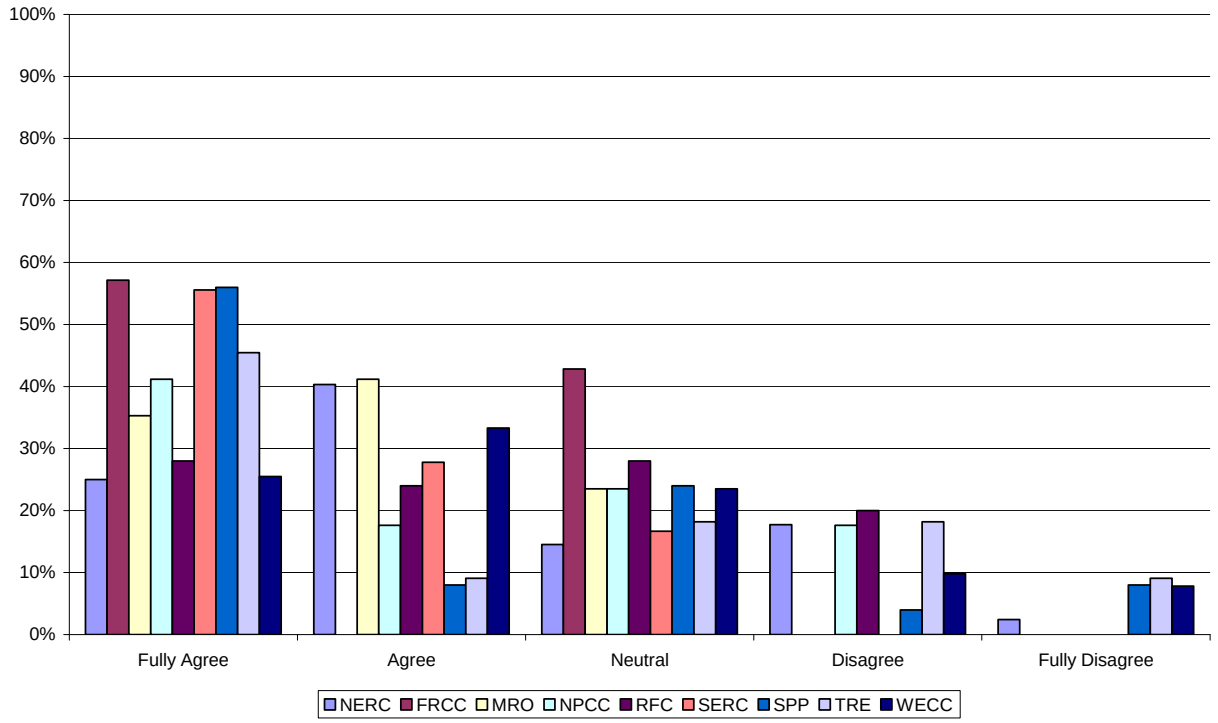
4. Primary Country:

	Response Percent	Response Count
U.S.	95.1%	135
Canada	4.2%	6
Mexico	0.7%	1
answered question		142
skipped question		0

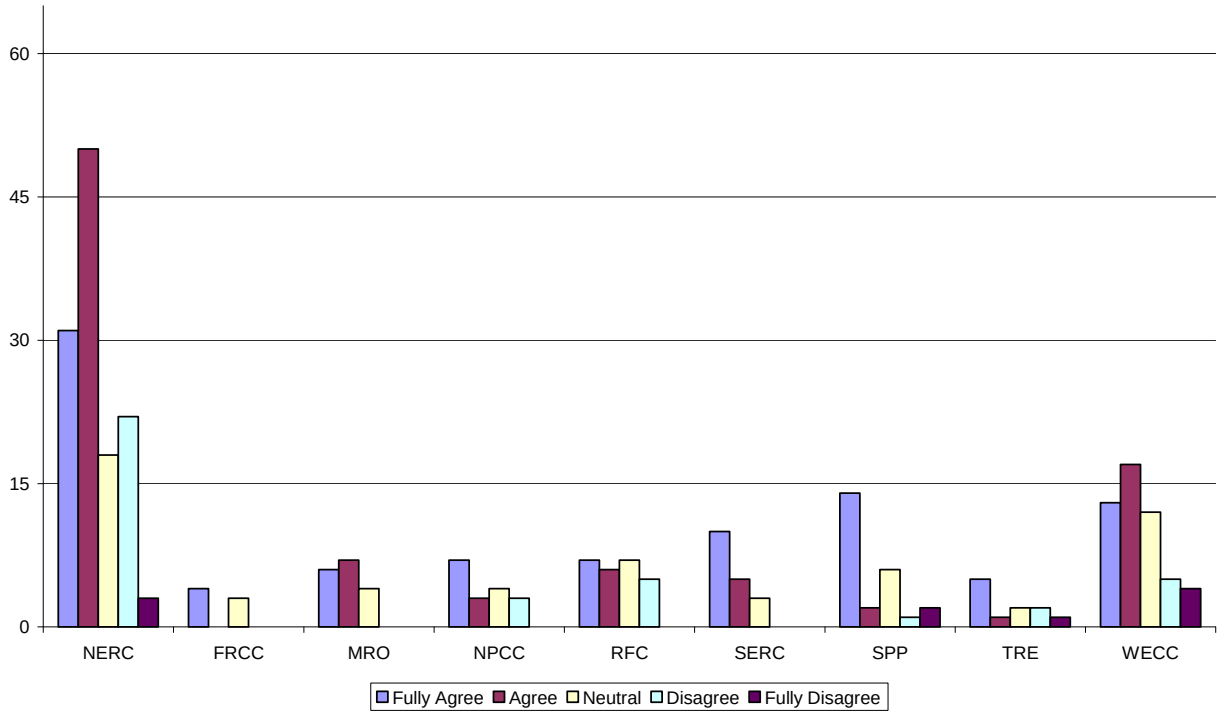
Reliability Standards

5. Has developed reliability standards that clearly indicate which bulk power system owners, operators, and users must comply.							
	NA – Not applicable or have no opinion	1 – Fully agree	2	3 – Neutral	4	5 – Fully Disagree	Response Count
NERC	0.0% (0)	25.0% (31)	**40.3% (50)**	14.5% (18)	17.7% (22)	2.4% (3)	124
FRCC	**85.4% (41)**	8.3% (4)	0.0% (0)	6.3% (3)	0.0% (0)	0.0% (0)	48
MRO	**68.5% (37)**	11.1% (6)	13.0% (7)	7.4% (4)	0.0% (0)	0.0% (0)	54
NPCC	**66.7% (34)**	13.7% (7)	5.9% (3)	7.8% (4)	5.9% (3)	0.0% (0)	51
RFC	**57.6% (34)**	11.9% (7)	10.2% (6)	11.9% (7)	8.5% (5)	0.0% (0)	59
SERC	**67.3% (37)**	18.2% (10)	9.1% (5)	5.5% (3)	0.0% (0)	0.0% (0)	55
SPP	**59.0% (36)**	23.0% (14)	3.3% (2)	9.8% (6)	1.6% (1)	3.3% (2)	61
TRE	**77.1% (37)**	10.4% (5)	2.1% (1)	4.2% (2)	4.2% (2)	2.1% (1)	48
WECC	**33.8% (26)**	16.9% (13)	22.1% (17)	15.6% (12)	6.5% (5)	5.2% (4)	77
					Comments and recommendations:		61
						answered question	**133**
						skipped question	**9**

ERO Survey - Reliability Standards
Question 5



ERO Survey - Reliability Standards
Question 5



	Comments and recommendations:
1	- Greater alignment is needed between the Functional Model (FM) Document and NERC's Registration Criteria. Major deviations between these two documents (FM Document and Registration Criteria) could result in incorrect functional assignment, or improper registration of a bulk power owner, operator or user. While the applicablity section is clear, the requirements in many standards do not indicate which entity must comply. There are many standards that need further work to insure assignments are correct or are made more clear.
2	1. Bulk power system, bulk electrical system, and impact to such are not fully defined. 2. Some approved standards gave the RRO responsibilities, but this was deemed inappropriate so the standards are being rewritten.
3	APPA believes the functional model-based approach to the NERC compliance registry provides a sound base-line to determine the applicability of NERC standards to most entities. However, there are a number of critically important breakdowns to this procedure related to the facilities that are deemed to be part of the BPS and the fact that the assumed duties of various functional entities do not consistently map to the actual tasks performed by real organizations. First, many reliability responsibilities are reallocated by small public power utilities to joint action agencies and host BAs/TOPs. JRO procedures and Section 500 of the ROP need further development in this area. Second the line delineating where the BPS begins and ends is less clear than it first would appear and appears to differ between utilities, sometime for good operational reasons and sometimes not. For example, if UFLS and other protective relays are on the transmission side of the point of interconnection, does the DP need to register and perform UFLS? If the DP owns and paid for the step-down transformer that radially connects the DP to the BPS, must it register as a TO? The current controversy and confusion concerning the obligation of some generation owners to register and perform TO and TOP functions is a similar concern for which there is merit on both sides of the argument. In the GO/TO context, the answer may come from creation of a new functional category such as Generator Interconnection Owner/Operator. More generally, Applicability rules may need to be refined to define applicability in terms f the specific facility classes owned by the entity. In at least one region (RFC), standard drafting teams have repeatedly attempted to extent the applicability of standards to encompass generation and distribution facilities that are not currently part of the BPS and would not meet NERC compliance registry criteria to place the facility's owner/operator on the NERC compliance registry. Municipal and cooperative utilities have consistently opposed such efforts. The RFC SDTs have not supported their proposals by credible studies showing an adverse material impact on reliability of excluding such small entities and the generation and distribution faciites they own. Similar efforts were undertaken to extent the applicability of standards to include very small LSEs (e.g., 1 MW) that have no material impact on BPS reliability. Such regional differences in proposed applicability for reliability standards should not be allowed in the absence of compelling reliability impacts.
4	AS A SMALL UTILITY IT HAS BEEN OVERWELMING PUTTING ALL DATA TOGETHER AND LEARNING THE COORECT/ACCETABLE DOCUMENTS TO BE IN COMPLAINCE. THERE SHOULD BEEN MORE OF START UP PERIOD FOR TRAINING AND FULL ENFORCEMENT WITH FINES.
5	Better definition of the entities is needed. There also needs to a recognition of the role of the RTO/ISO
6	Certain of WECC's Tier I Standards do not make clear to which entities they apply.
7	Compliance obligations for the NERC and WECC reliability standards are dependent upon entity registrations for the functions as defined in the NERC Functional Model. The NERC Functional Model does not adequately account for the variety of business models utilized by owners, operators, and users of the bulk power system. Many registered entities are not and never have been traditional vertically integrated utilities, and therefore their business models cannot be effectively compartmentalized into the functions as designed. Even if the NERC Functional Model was an effective basis for determining applicability and therefore compliance responsibility, many of the standards are not clear regarding their functional applicability. Some standards have identified certain functions in the Applicability section without identifying the obligations of those functions in the Requirements section. Other standards have identified obligations of certain functions in the Requirements section without identifying those functions in the in the Applicability section. Yet other standards identify certain functions in both the Applicability and Requirements sections, but don't clearly identify the obligations of those functions in the Requirements section. A rule of thumb is that the identified functions that precede the "shall" in the Requirements section have a compliance obligation, but this rule of thumb requires registered entities to review every requirement of every standard to determine applicability and the associated compliance obligations.

	Comments and recommendations:
8	Currently SERC does not have an operational “Standards” link on its Website leaving viewers the impression that SERC is not involved in any regional standard development. Even though the Region does not currently envision development of region-specific standards, except those required by NERC’s Reliability Standards Three-Year Work Plan, SERC does has the following activities underway to develop regional standards: Underfrequency Load Shedding (PRC-006) Special Protection Systems (PRC-012, 013, 014, 015 & 016) Disturbance Monitoring Equipment (PRC-002 Disturbance Control Performance (BAL-002) In addition to standards, SERC has historically maintained a set of approximately 25 “SERC Supplements” to promote good utility practice and consistency in achieving compliance with reliability standards. There is much confusion within SERC as to the purpose of the supplements. For instance, is the registered entity required to adhere to the supplements? If so, registered entities will be under the impression that they are mandatory and enforceable. However, since they are not approved standards, violations would not occur as a result of not following the supplements. The responsibility for adhering to the supplements should be made clear. For easy access, it is recommended SERC provide the 25 supplements within the “Standards” link on the website and provide an adequate overview to its members on their relevance to enforceable standards.
9	drafting teams often forget the Registry criteria as they are working. While this is allowed, there needs to be a compelling reason to capture non registered entities and an outreach to ehem as the standard is developed. it is not always clear at the conclusion of the process just who is being captured.
10	Every reliability standards contains an Applicability section which identifies the registered functions (ie. TO, TOP, GO, GOP, BA, LSE) that must comply with the standard. Although the Applicability section identifies these entities there are issues that need to be resolved: - Planning Authority versus Planning Coordinator - NERC currently has registered companies under the functional category Planning Authority, which is based on the original Functional Model (FM) term, but newer standards are using the (FM) term Planning Coordinator. NERC has not communicated a plan that outlines how they are going to modify their existing registration, Rules of Procedure and reliability standards containing the references to the Planning Authority. - Greater alignment is needed between the Functional Model (FM) Document and NERC's Registration Criteria. The FM Working Group has a process for providing advice to Standard Drafting Teams, but any advice given/used needs to align with existing registration and registration criteria. Major deviations between these two documents (FM Document and Registration Criteria) could result in incorrect functional assignment, or improper registration of a bulk power owner, operator or user.
11	For example, PRC-007 requires an RRO to develop and coordinate a UFLS program that in turn Transmission Owners and Distribution Providers will ensure their programs are consistent with the RRO’s UFLS program. To date WECC has not provided sufficient information to the registered entities in its region to allow them to determine whether this requirement applies to them and if so, how. This has created generally confusion and an expenditure of resources that could have been avoided with additional guidance and clarification from WECC. In addition, the differences between the eastern and western structure and the absence of addressing those differences in all of the Interchange Authority standards has caused a great deal of additional work for the WECC region in order to reorganize itself to ensure compliance.
12	For the most part, Manitoba Hydro would agree that the NERC standards clearly indicate who is responsible for compliance to the various standards. The Interchange Authority standards are one significant exception. The description of this function in the Functional Model does not seem to recognize or understand how this function is performed in the industry. As a result, industry participants are unwilling to accept compliance responsibilities for these standards as currently written. The MRO Standards are much less specific in the assignment of responsibility for the various requirements. By including too many responsible entities, there is confusion and uncertainty regarding who is effectively responsible for the various requirements.
13	For those Rel Stndrds where there is a question as to whom it applies, the present "Request for Interpretation" process works very well. The only improvement would be to shorten the time frame from requesting an interpretation to getting the interpretation balloted.
14	Iberdrola Renewables encourages the NERC to focus on efficacy when developing new standards to ensure all requirements truly promote improved grid reliability without subjecting registered entities to unnecessary costs and requirements.
15	It is difficult for users, owners, and operators to clearly identify themselves with the functional model used to create the standards and compliance roles and responsibilities. It is particularly difficult for users, owners, and operators to identify with standards that often mix many entities together in a single requirement. While this standards development practice appears to be no longer occurring in new and revised requirement language, the process to revise standards is too slow. The applicability section of all the standards should be reviewed and revised, if necessary, to more clearly indicate which BES owners, operators, and users must comply with each requirement. When considering whether an applicability section is correct and unambiguous, NERC should pay special attention to regional areas where the industry has evolved from the vertically integrated utility model, such as LSEs with retail access, local control centers in RTOs, and with unregulated

	Comments and recommendations:
	generation. Finally NERC should simplify and resolve its Functional Model. For example, it is difficult to consistently distinguish across the standards the roles and responsibility of the Generator Operator (GOP) and Generator Owner (GO) functions within some standards. The GOP function should be reserved for day-to-day operating actions that may be required for BES reliability, and the GO function should address information on the asset such as unit capability, modeling data etc. The MOD-024-RFC-01 standard, Real Power Verification, is a recent example of using the GOP instead of the GO in a way that is inconsistent with the NERC MOD-024 standard.
16	It is unclear that NERC or RFC comprehend the differences in electric systems that exist and that "one size fits all" does not apply. There is a disconnect between Registry Criteria and Standards applicability such that entities that are required to register have no Standards that apply to them. Unduly burdensome are the requirements to prove that Standards are, in fact, inapplicable.
17	Lompoc is a very small municipal utility registered as a ISE and DP. It appears that we may be required to comply with various standards, even though or system is radially fed with no direct impact to the bulk power system.
18	Many of the original Version 0 standards have requirements that apply to multiple functional entities, and interfaces between those entities are unclear (e.g. the transmission owner/generator interface). Also, a well-defined definition of the bulk electric system would provide a better understanding of elements that are included.
19	Most of the Standards clearly identify the applicability. Some of the Standards go one step further and spell out qualifiers such as "… a BA who performs X".
20	NERC - In some standards it is not obvious.
21	NERC NERC has diligently applied the Federal Power Act Section 215 modifications requiring all users, owners and operators of the bulk power system to comply with all applicable reliability standards. When NERC was established as the ERO in 2006, and since that time, the Functional Model has undergone revisions by the Functional Model Working Group in order to properly apply compliance enforcement to those responsible for meeting the requirements of the standards. It has been a step change for the industry due to the inclusion of a number of new entities and the Functional Model has been a work in progress. NERC has modified the standards and successfully implemented the Applicability section in order to clearly state the functional entities responsible for the standard. This has been effective from a technical as well as compliance/legal aspect in clearly identifying those responsible for the standard. The Functional Model is critical to understanding each function, role and responsibility in order to ensure continuity of bulk power system planning and operations. NERC should continue to present the Functional Model in regular standards and compliance forums so that industry participants are frequently updated, aware of, and understand the interrelationships between the functions. NERC should make access to the Functional Model document more accessible - currently it is not an easily discovered document on the NERC Website. NERC should continue to solicit industry input to the Functional Model Working Group revisions process – thereby including those best suited to understand the functions and relationships within and between entities that are responsible for the bulk power system functions. SPP SPP has an excellent set of operating criteria that has been in existence well before the NERC Reliability Standards. SPP is currently in the process of developing a Regional Reliability Standard on Underfrequency Load Shedding.
22	NERC There have been some exceptions but overall reliability standards are stakeholdered with the industry and as such the applicability of standards becomes apparent when the standards are finalized. NPCC NPCC has started developing regional reliability standards through NPCC's Regional Standards Committee (RSC). NPCC's regional criteria clearly indicate which bulk power system owners, operators and users must comply.
23	NERC Reliability Standard clearly indicates, in the Applicability section, which functional entities have compliance responsibilities. However, there are still some issues with respect to functional model and/or registration which do not clearly delineate the responsibilities, for example: 1. Planning Authority versus Planning Coordinator 2. GO/GOP and TO/TOP responsibilities for lead lines

	Comments and recommendations:
24	NERC reliability standards contain an Applicability section that clearly identifies which functional entities have compliance obligations for a standard. Although the Applicability section identifies these entities there are issues that need to be resolved: NERC currently has registered companies under the functional category Planning Authority, which is based on the original Functional Model (FM) term, but newer standards are using the FM term Planning Coordinator. NERC has not communicated a plan that outlines how they are going to modify their existing registration, Rules of Procedure and reliability standards containing the references to the Planning Authority. Greater alignment is needed between the FM document and NERC's Registration Criteria. The FM Working Group has a process for providing advice to Standard Drafting Teams, but any advice given/used needs to align with existing registration and registration criteria. Major deviations between these two documents, the FM document and Registration Criteria, could result in incorrect functional assignment, or improper registration of a bulk power owner, operator or user.
25	NERC reliability standards contain an Applicability section that clearly identifies which functional entities have compliance obligations to a standard. Although the Applicability section identifies these entities there are issues that need to be resolved: - Planning Authority versus Planning Coordinator - NERC currently has registered companies under the functional category Planning Authority, which is based on the original Functional Model (FM) term, but newer standards are using the (FM) term Planning Coordinator. NERC has not communicated a plan that outlines how they are going to modify their existing registration, Rules of Procedure and reliability standards containing the references to the Planning Authority. - Greater alignment is needed between the Functional Model (FM) Document and NERC's Registration Criteria. The FM Working Group has a process for providing advice to Standard Drafting Teams, but any advice given/used needs to align with existing registration and registration criteria. Major deviations between these two documents (FM Document and Registration Criteria) could result in incorrect functional assignment, or improper registration of a bulk power owner, operator or user. - There are cases where the standard applicability seems clear, yet confusion remains in the industry. For example, there is an on-going issue as to whether CIP-002 through -009 should apply to Nuclear Stations. In addition, there have been assertions that FAC-003 applies to generator leads even though the standard as specified in the Applicability Section applies only to Transmission Owners and Regional Reliability Organizations. NERC's solution to date has been to have generator owners register as transmission owners.
26	NERC reliability standards contain an Applicability section that clearly identifies which functional entities have compliance obligations to a standard. Although the Applicability section identifies these entities there are issues that need to be resolved: The NERC and Regional Standards may not deviate from the Applicability section as defined in the NERC's Registration Criteria. The Standard Drafting Teams (SDT) in RFC and NPCC are revising the language in the applicability section to Generation Owners (GO). The standard applicability is not consistent with the NERC definition of Bulk Electric System (BES) (i.e., individual generation resources larger than 20 MVA or a generation plant with aggregate capacity greater than 75 MVA that is connected via a step-up transformer(s) to facilities operated at voltages of 100 kV or higher). Dominion recommends that NERC should create a new entity category defined to register (e.g. GO lite) connected to non-BES facilities prior to implementation. Also the issues related to GOs owning radial transmission lines need to be addressed.
27	NERC standards are generally divided into categories based upon ownership and operation of assets, but there are other variables and overlaps. Difficulties are encountered and controversy occurs when functions/categories are not appropriately defined, or entities are required to register for functions/categories that do not properly reflect an entity's ownership, operation or regulatory status. If NERC undertakes a review of the functional model in the future, then NERC should consider: 1) The ownership and operational control of assets and which entities have the legal authority to control the reliability functions of those assets. This is especially important for new categories, such as Load Serving Entities (LSE), as "LSE" is not consistently defined among markets and the majority of standards and requirements in this category are related to entities that own transmission or distribution assets. 2) The differences in market constructs and infrastructure ownership and operation between: 1) competitive retail markets and 2) bundled, integrated utility markets. This is especially important in performance of the distribution provider (DP) function and the newly established LSE function. 3) Whether there is sufficient flexibility for different market constructs for accurate categorization of users of the bulk power system.

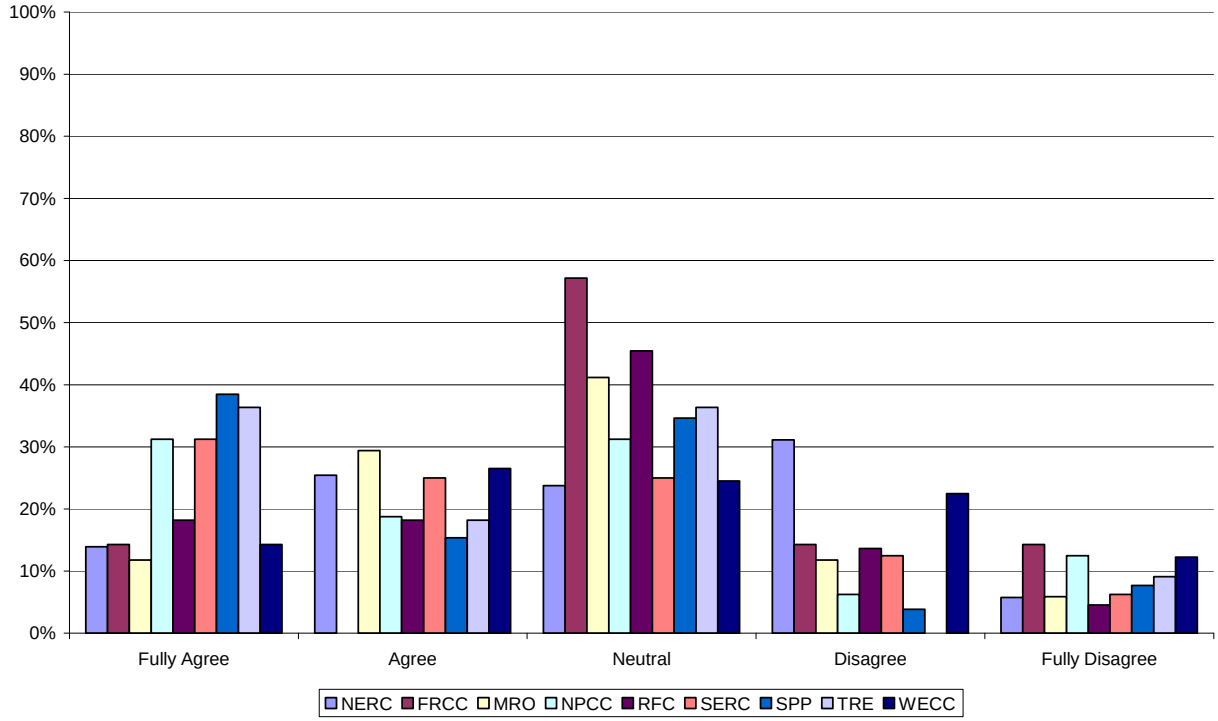
	Comments and recommendations:
28	NERC- The Compliance Registry Criteria and the resulting Compliance Registry do a reasonable job of identifying entities that must comply with reliability standards. NERC and the Regions need to continue to focus on entities whose actions and facilities have a material impact on the reliability of the bulk power system. RFC- Some RFC Standard Drafting Teams (SDTs) have made efforts to expand the Criteria to include non-registered entities in the applicability section of draft standards. While SDTs may seek to extend the applicability of a reliability standard or requirement to entities that are not currently registered, the burden should be on the SDT to clearly demonstrate that there would be a material adverse impact to the reliability of the bulk power system from the failure to extend such applicability to entities not encompassed by the NERC Compliance Registry Criteria. The Compliance Registry Criteria are meant to provide certainty and to avoid having NERC and the Regional Entities waste scarce resources on entities that will not have a material impact on the reliability of the bulk power system.
29	NERC, through regulatory filings and numerous workplans, has committed to providing additional granularity in the applicability sections of reliability standards. Today, this is being addressed on a piecemeal basis; therefore, NRECA suggests that a comprehensive review of the full body of NERC reliability standards (and Regional reliability standards) be conducted to determine needed applicability revisions. Such a review and related revisions would provide the users, owners and operators of the bulk power system with the needed clarity to determine which standard requirements apply to them. Additional granularity in the applicability of reliability standards could also contribute to reducing the workload of Regional Entity (RE) staff, especially as it relates to the dismissal of potential violations. This could provide RE staff with additional time to focus on those standards violations that truly impact the reliability of the bulk power system
30	NERC's functional model does not fit all circumstances.
31	NERC's standards more or less define which BES owners, operators, and users must comply with them. WECC's standards are somewhat less clear, as there seem to be variations from the rest of the country's standards.
32	NPCC must continue to revise its documentation to specifically target appropriate functional entities (eg. eliminating the term "Area).
33	Q1 NERC: While the applicability section is clear, the requirements in many standards do not indicate which entitiy must comply.
34	Registration has been very confusing. The District received an assessment from its Balancing Authority that identified how we should register. This assessment referenced WECC and NERC interpretations that only former control areas need to register as Transmission Operators. We initiated working on a delegation agreement but during this period of time our Balancing Authority changed its mind and referenced changes from NERC and WECC. Another issue is based on the extremely low thresholds identified in the registration criteria there are very small to medium size electric utilities developing process and plans that have no impact on system reliability. At best they address local customer service issues that are the jurisdiction of the local PUC's. These mandates and interpretations are being driven by FERC, and NERC and the RRO are carrying them out.
35	RFC is very agressive in their standards work. In some cases out in front of NERC, which is difficult to understand as FERC has indicated that they willl not approve a regional standards while a national standard is being worked on.
36	Several Standard Requirements indicate for instance that the Reliability Coord. must do something, yet it must be in coordination with the Gen Operator. Therefore, it's is unclear exactly the responsibility of the GOP.
37	Some NERC standards are still not precise on when they apply and when they don't, however the standards are moving the right direction and drafting teams are addressing these issues as they move through standards.
38	Some standards are confusing and have gone through multiple interpretations. (e.g. TPL standards). The functional model, which defines the entities to which the standards apply, has gone through several revisions, but has not gone through the formal standards process. (Is there a Planning Authority or not?)
39	SPP is a party to the IRC Standards Review Comments, please refer to that submittal for our response to this question.
40	Standard development is improving but ambiguity exists in standards as to who must comply.
41	Standards are thorough and self explanatory. SPP has been very helpful with questions regarding standards applicability.
42	The Applicability section of each NERC standard clearly indicates which functions must comply with the respective standard but within some of the standards, functions that are not identified in the Applicability section of that standard are identified in requirements for which the funtion must comply.

	Comments and recommendations:
43	The Reliability Standards indicate which entities must comply, but some standards combine all entities together, therefore requiring applicability to all. Most DP's & LSE's are small municipal utility companies that are considered to be a load from the transmission provider. Some standards require that the small DP's & LSE's comply on the same standards as the TOP,GO,GOP,BA. These standards should remove the applicability to DP's & LSE's.
44	The SPP has a very difficult to understand website that does not clearly define things in my opinion. The TRE needs to expand their website, however, I know that it is quite new.
45	The standards always indicate clearly which Responsible Entities must comply. However, NERC standards are generally applied into categories based upon ownership and operation of assets, which does not always align with responsibilities outlined in standards. Difficulties are encountered and controversy occurs when NERC has not appropriately defined functions/categories or attempts to force fit entities into functions/categories that do not properly reflect an entity's ownership, operation or regulatory status. In the registration process, there have been many occasions where it is unclear in which functional model classification a particular power system owner operator or user should be registered as the responsible entity. However, some EPSA members have occasionally found it unclear which Responsible Entity best describes the reliability functions they perform and hence which to select when establishing registration with NERC. The net effect becomes that after standards are effected that individual entities have difficulty making a determination as to whether or not a particular standard should be applied to them. The difficulty described above is exacerbated since some standards have been written to encompass several reliability functions, requiring several Responsible Entities to comply with the standards despite differences in the physical characteristics of the entities filling those roles. A standard can apply to both a Generator Operator (GOP) and Transmission Operator (TOP), for example, without fully appreciating the real differences between these entities. Therefore, standards must consider different configurations and not apply blanket compliance through the 15 compliance registry slots. "Shoe-horning" compliance for several entities under a single standard makes the standard drafting and registration process move along, but does not provide adequate compliance guidelines to ensure reliability. It would be preferable if NERC: 1) Respected ownership and operation of assets in developing and updating its functional model. This is especially important for new categories, for example Load Serving Entities (LSE), as "LSE" is not consistently defined amongst markets and the majority of standards and requirements in this category are related to entities that own transmission or distribution assets. 2) Recognized differences in market constructs, ownership and operation between competitive retail markets and bundled, integrated utility markets. This is especially important in performance of the distribution provider (DP) function and the newly established LSE function. 3) Permitted sufficient flexibility for different statutorily-mandated markets, as in ERCOT, where the standards and requirements are performed by entities with operational control or ownership of assets and related responsibilities. Force fitting markets and entities into the NERC categories/functions without regard to different market constructs and ownership/operational issues creates unnecessary complexity, may negatively impact reliability, adds unnecessarily to industry workload and cost without a reliability benefit, and may eventually impact growth and sustainability of competitive markets.
46	The standards deal with two definitions that are used. Bulk Power System and Bulk Electric System. The two have different definitions and sometimes one or both are used in presentations and conversations. Please pick one and get rid of the other for use in the standards. Also, while these definitions are obviouse for high voltage and regionally critical facilities, there is too much vagueness for 115 kV facilities. I would desire that all 115 be excluded (except RRO designated critical facilities) but I would rather that the exclusion language be crystal clear or eliminated entirely. I am still not sure which of my 115 kV lines may not be part of the BES definition that uses the term "generally." If you mean all 115 kV facilities then say so. If not be specific of which facilities may be excluded.
47	There are a few standards that are applicable to a PSE entity, but it states that another enitity Shalll.....
48	There are some standards that are left to interpretation. A point of contact would be helpful to clarify expectations.
49	There are some that could be made clearer like those that apply to more than one function, e.g. "BA or TOP."
50	There have been some exceptions but overall reliability standards are stakeholdered with the industry and as such the applicability of standards becomes apparent when the standards are finalized.
51	There is a need to better define which reliability standards/requirements really need to apply to small entities (e.g., small DP, small LSE, small TO, etc.) for protecting the reliability of the BPS. A good example is the WECC "LSE/DP MOU on Compliance". A similar iniative is needed continent-wide, and needs to include the TO and TOP functions at a minimum.

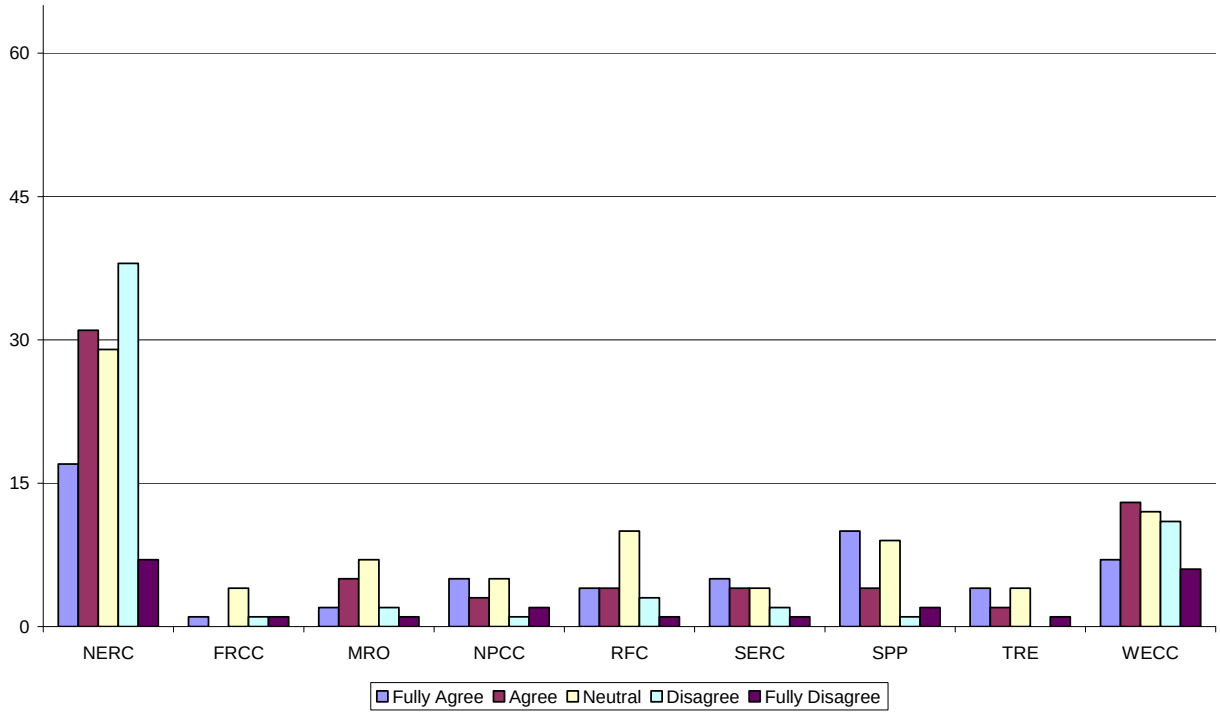
	Comments and recommendations:
52	There is still significant confusion and debate about what entities should be registered and thus, what requirements of the NERC Standards are applicable. Much of this stems from lack of clarity on the Bulk Electric System Definition. In particular, WECC in its compliance audits, is disregarding clear direction provided in NERC's response to FERC Order 693 Para 77 in the determination of which elements of the electric system are to be considered as part of the Bulk Electric System.
53	There was confusion and little guidance in what defined the "Bulk Power System". In addition, the standards do not explicitly indicate who must comply with which requirements and sub-requirements. While NERC has the VRF Requirements matrix, they have been cautious in having it become a document used to define which functional entities must comply with the various requirement.
54	This might be a "trust" issue. Most WECC standards apply only to entities owning/operating facilities on rated paths. IN the case of relay mis-operations, there is a perceived lack of standard for the rest of us and a fear the existing standard will be interpreted to apply to everyone. Clear, declarative statements, in writing, stating "will not be applied to anyone else," could be helpful. Documentation and terms require too much reading and discussion to say that they "clearly indicate" who must comply. Still seems subjective depending on the auditor with respect to interpretation and enforcement. Each standard clearly states what "function" are responsible for the standard. However, there is still some ambiguity about what functions the utilities need to register for. Particularly confusing for the BAL standards (i.e. what is marketing and what is reliability).
55	TRE has not developed any Reliability Standards as of date.
56	Vague and difficult to indicate the requirements for small utilities
57	We are a small utility on a radial transmission line who has no material impact on the bulk electric system. There needs to be a better definition of bulk electric system and what exactly material impact means. We maintain and operate a 230 Kv transmission line for a local mine. Unfortunately the mines loads of 30 Mw eceed the threshold and together with the 230 Kv transmission line our electric cooperative consisting of 16 employees and 2000 members is subject to a host of reliability standards. Trying to remain in compliance with ever changing standards actually poses a threat of our system being less reliable locally and havig no ability to impact the bulk electic system.
58	We believe TRE does not soley rely on the latest version of the NERC Statement on Registration Criteria for registration. TRE seems to rely more on making all participants in the ERCOT Market fit somewhere in the NERC model, even if they do not meet the definitions in the NERC Registration Criteria.
59	WECC has extend requirements to those beyond those listed in thestandard Applicability section
60	While standards do provide an explicit list of applicable functional entities, there are issues that arise within standards as to which entity is responsible or why the particular entity has been identified. Also, there are issues when there are shared responsibilities across multiple entities. The latest change to the NERC statement of registration criteria underscores the issues with application of requirements to the LSE function. Rather than modify the definition, the standards and requirements need to be revisited. NERC must adjust processes to produce standards have the clarity necessary to eliminate these responsibility ownership issues. SPP and TRE have not yet progressed enough to fully evaluate development of regional standards.
61	Wholesale power contracts cause a mix of responsibilities for standard compliance which is not addressed in a blanket approach to assignment of ownership.

6. Has developed reliability standards that provide a clear indication of the level of performance required and the measures used to evaluate performance.							
	NA – Not applicable or have no opinion	1 – Fully agree	2	3 – Neutral	4	5 – Fully Disagree	Response Count
NERC	0.0% (0)	13.9% (17)	25.4% (31)	23.8% (29)	**31.1% (38)**	5.7% (7)	122
FRCC	**84.4% (38)**	2.2% (1)	0.0% (0)	8.9% (4)	2.2% (1)	2.2% (1)	45
MRO	**66.0% (33)**	4.0% (2)	10.0% (5)	14.0% (7)	4.0% (2)	2.0% (1)	50
NPCC	**67.3% (33)**	10.2% (5)	6.1% (3)	10.2% (5)	2.0% (1)	4.1% (2)	49
RFC	**60.7% (34)**	7.1% (4)	7.1% (4)	17.9% (10)	5.4% (3)	1.8% (1)	56
SERC	**69.2% (36)**	9.6% (5)	7.7% (4)	7.7% (4)	3.8% (2)	1.9% (1)	52
SPP	**55.9% (33)**	16.9% (10)	6.8% (4)	15.3% (9)	1.7% (1)	3.4% (2)	59
TRE	**76.1% (35)**	8.7% (4)	4.3% (2)	8.7% (4)	0.0% (0)	2.2% (1)	46
WECC	**34.7% (26)**	9.3% (7)	17.3% (13)	16.0% (12)	14.7% (11)	8.0% (6)	75
						Comments and recommendations:	56
						answered question	**131**
						skipped question	**11**

ERO Survey - Reliability Standards
Question 6



ERO Survey - Reliability Standards
Question 6



	Comments and recommendations:
1	# 1: Many of the requirements and violation severity levels in the standards lack clarity and are open to various interpretations. It seems as though the threshold for showing compliance during an audit is much lower than what is expected during an event investigation. The interpretation of requirements seems to bleed into best practices and even into future standards during an investigation. NERC and FERC seem to have a much stricter interpretation of the requirements than SERC does. #2: The definitions of the Violation Risk Factors do not reflect the true impact on reliability of violating a standard and are not applied consistently among different standards. Additional VRFs should be added and the definitions refined so that a more nuanced analysis of impacts on reliability could be achieved. As part of that exercise the VRFs should be reviewed for consistency among standards. #3: The industry needs and asked for clarification regarding issues such as the Technical Feasibility Exception related to NERC CIP requirements. While full compliance with the stated requirements is due in 2009, questions regarding the TFE process remain outstanding and un-answered by NERC. #4: The CIP standards have a staggered timeline with different compliance targets for BA/TOP (Table #1) vs. GO, TO, etc. which may implement compliance using table #2 and #3. This has created much confusion. Staggered timelines should be avoided in the future. #5: The industry is in the process of implementing the CIP standards over a period of years. During the implementation, the NERC regions have begun spot check compliance audits. The compliance audits ignore the dependencies of one requirement on the precedent of another requirement prior to completing implementation. The NERC approach of beginning the compliance phase while the industry is in the midst of implementation has created confusion. # 6: NERC should provide greater clarity on effective date provisions for Reliability Standard implementation. FERC has stated that entities should adhere to a Reliability Standard in accordance with its terms and conditions upon adoption by the NERC Board of Trustees. This is considered good utility practice and is not sanctionable by financial penalty for non-compliance until a Reliability Standard is approved by FERC. Recently, a Reliability Standard adopted by the NERC Board of Trustees contained an effective date contingent upon FERC approval. NERC should provide date certain effective dates for each NERC approved Reliability Standard to allow for reasonable implementation by the industry.
2	1. The level appears to be somewhat subjective.
3	Agree for the most part. However there are instances where the requirement language is open to interpretation. The fact that separate measures are needed indicates that some requirements are note crystal clear. For absolute clarity, the measurement for each requirement should be included as part of the requirement.
4	AS A SMALL UTILITY IT HAS BEEN OVERWELMING PUTTING ALL DATA TOGETHER AND LEARNING THE COORECT/ACCETABLE DOCUMENTS TO BE IN COMPLAINCE. THERE SHOULD BEEN MORE OF START UP PERIOD FOR TRAINING AND FULL ENFORCEMENT WITH FINES Just needed more semairs. we all are learnig as we go includinG NERC AND RFC STAFF.
5	Compliance is generally evidenced/proven via documentation. The NERC standards and requirements could be descriptive by providing: 1) examples of documentation that can be used to substantiate compliance, and 2) a web-link that provides quick access to the clarifications provided by the Regional Entities or NERC to industry participants in clarifying requirements.
6	Compliance measures describe the action required in order to demonstrate compliance. Additionally, RSAW's are available that provide guidance on what the regional compliance audit staff will review.
7	During the conversion of NERC policies to standards, many requirements and sub-requirements were translated without completely capturing the level of performance required or the measures used to evaluate performance. This has also complicated the process of associating violation severity levels (VSLs) and violation risk factors (VRFs) to these requirements and sub-requirements.
8	Fully disagree – WECC has a generator testing policy that includes requirements to meet standards MOD 13, MOD 24, and MOD 25. There is no indication which requirements are associated with which standard. In a request for guidance from WECC, I was referred to a document that is not included as part of their test policy documents. As a second example, the VAR standards are ambiguous. Standards state generator operators must operate generators in AVR mode. Interpretation required numerous discussions with WECC personnel and the author of the standard. Both the NERC and WECC web sites are confusing. Better document organization and better descriptions of the files contained within a folder or page would help.
9	Have no idea what the real performance measures are
10	I think the main weaknes in the standards is the Applicability. Once I know a standard is applicable, it seems for most of the standards apparent how to comply with them.

	Comments and recommendations:
11	In many of the NERC Reliability Standards it is not sufficiently clear what is required by the Applicable Entities to adequately demonstrate compliance. This is due to the fact that many of the standards were developed for a voluntary compliance environment. Going forward, the Reliability Standards need to be revised for increased transparency with respect to what is required by the Applicable Entities to demonstrate their compliance.
12	Initial interpretations have changed on some standards and disagreements among regions persist. The standards do not provide precise measures of the performance expected from the registered entities. The RSAWs primarily restate the standard, which provides the entities little guidance. FERC Order 693's interpretation of the standards provided clear language for the requirements but this was not reflected in the original standards. NERC should seek clarification of FERC Order 693, since some standards do not have interpretations based on the clear language rule. Also, the Compliance Backlog information provided at various Compliance User Group meetings provides limited useful feedback to the industry for meeting the standards.
13	It is important to have measures that directly reflect what the requirement ststes.
14	It is very good that active industry representatives are developing the standards to make them most relevant. But because of the possibility of sanctions, the letter of the law must be followed, and that makes varying interpretations of the standards very problematic for uniform implementation within and across all regions. The formal interpretation process and standards update process is the right way to go to provide clarifications, but the update process takes a longer time than desired and currently does not seem to involve a large percentage of the affected entities.
15	Many of the reliability standards are subject to varying interpretations. The formal NERC interpretation process is time consuming. Attempts to obtain interpretations to ensure clarity around the performance required are not always successful. A good example where the reliability standards lack clarity is in the definition of the Bulk Electric System. While the definition appears straightforward, application of the definition to the facilities has resulted in some confusion about which facilities are covered by the standards. Moreover, WECC's adoption of a standard governing "critical paths" seems redundant because it seems if the paths are critical they would already be considered part of the Bulk Electric System. As for measures used to evaluate performance, the experience on this is mixed as well because it seems dependent on the auditor or staff person providing guidance at the time which often times creates a moving target for entities trying to comply.
16	Many standards are vague and it takes more time to figure out what is wanted than it actually takes to comply. Example: FAC-008 R1 reads "A statement that a Facility Rating shall equal the most limiting applicable Equipment Rating of the individual equipment that comprises that Facility." We initially had a full description of summer and winter capacity tests the established equipment ratings for this facilty." We were given a violation because we did not have the following statement: "The Fountain Valley Power Rating shall equal the most limiting applicable Equipment Rating of the individual equipment that comprises Fountain Valley." This is obvious and has no meaningful information, but we got a violation for it anyway.
17	Many standards contain ambiguities that make compliance particularly challenging for entities. In many cases, measures do not exist for corresponding requirements. Entities waste considerable time and energy trying to decipher intent and expectations.
18	Much of the required information regarding expected levels of performance and associated measures is either vague or non-existent. The newer versions of the standards are seeing some improvements over the version 0 standards – seems to be heading in the right direction.
19	NERC During the conversion of NERC policies to standards, many requirements and sub-requirements were translated without completely capturing the level of performance required or the measures used to evaluate performance. This has also complicated the process of associating violation severity levels (VSLs) and violation risk factors (VRFs) to these requirements and sub-requirements. NPCC NPCC has started developing regional reliability standards through NPCC's Regional Standards Committee (RSC). NPCC's regional criteria provide a clear indication of the level of performance required and the measures used to evaluate performance.
20	NERC - In most cases the levels of performance is clear. Reporting entities are spending time and effort in an attempt to determine what is required to meet the measurees as this is not always obvious.

	Comments and recommendations:
21	NERC The work required to convert the original NERC policies and procedures into working reliability standards that are both clear and enforceable was a considerable task. NERC has worked diligently within the standards development process in order to establish strong, technically sound standards that are able to effectively provide for the reliability of the bulk power system. An enormous challenge for NERC has been both the volume and detail required in order to meet the legal elements of the FPA Section 215 and the resulting FERC Order 693. NERC continues to follow the standard development process that includes technical expertise from those within the segments of industry best suited to design and modify reliability standards. The bulk of additions and modifications to the original Version 0 Standards were necessary for clarity and substance within the standards for establishing performance measurement and enforceability. NERC has struggled in order to provide these due to the enforceability nature of the standards. Standards were developed or amended containing measurement language that often implied additional standard requirements without such requirement language in the body of the standard. Also, in an effort to detail the standards with the rigor required within the measurement sections, additional and unjustified requirements and obligations to standards were generated that did not maintain or improve reliability to the bulk power system. As a result, standard drafting teams struggled with the work scope and took additional time in order to fully develop standards that provided the necessary performance and compliance elements. NERC must continue to provide material guidance and training for drafting teams such that the performance measures and the standards requirements resulting from the drafting team's work are in line with and supporting the overall scope of reliability for the bulk power system. Also, the intrinsic level of reliability for the bulk power system, for which each requirement of each standard should support, remains an indeterminate. NERC should continue to pursue and design the level of reliability of the bulk power system that coordinates with each developed standard.
22	NERC and the industry is aware of this, and efforts are being made for current and future standards development teams to provide a full complement of measures to go along with the requirements.
23	NERC is behind in this area and is working hard to correct this.
24	NERC Reliability standards are fairly specific, but the Measures and RSAWS are vague and difficult to follow. Sometimes the questions don't even match the RS.
25	NERC Standards could have been much more detailed.
26	NERC Standards originated from NERC Policies in an era of voluntary compliance. As such, they lack the necessary specificity to become effective mandatory, enforceable Standards. Pursuant to EPACT, virtually all of the body of NERC Standards were swept into the stage of Mandatory compliance, while only a small portion of the Standards have appreciable influence upon the reliability of the BES, for example, Balancing (BAL), Voltage control (VAR), and transmission operating (TOP). The remainder of the Standards carry far lesser impact on reliability, and some, for instance the ATC/TTC/TRM/CBM Standards of the MOD category are purely commercial in nature. Yet all of these Standards carry the same sets of auditable documentation burden and sanction/penalty consequence potential.
27	NERC-Many standards, particularly Version 0 standards, are not clear and in many cases NERC has declined to provide guidance on how entities can become compliant. NERC has expressed the concern that, as the enforcer of reliability standards, it cannot tell entities subject to the standard how to become compliant. Unfortunately, this attitude seems to place a higher premium on catching standards violations than on encouraging behaviors necessary to protect reliability. Additionally, the slow processing of potential violations and the confidentiality provisions surrounding investigations and settlements has impeded communications of findings from compliance audits and enforcement actions to registered entities. Again, the focus seems to be on punishment rather than reliability improvement. RFC- RFC does not have any FERC and NERC approved reliability standards; however, there is a concern about efforts of certain Standard Drafting Teams being intentionally vague in proposed standards requirements for the stated purpose of allowing latitude in the interpretation of the standard by the compliance program in the future. The MOD-024-RFC-1 standard is a specific example of this vagueness issue and it is up for RFC board approval in February.

	Comments and recommendations:
28	Our answer is in context of the version zero standards. The Version zero standards were based on NERC's voluntary policies and procedure and it's in that frame of reference that the industry has its understanding for satisfying our compliance obligations. - FERC's Order No. 693 applied interpretations that expanded the clear language of the requirement and was not supported by the body of work developed for the Version Zero standards. NERC's failure to seek rehearing on Order No. 693 has resulted in some Version Zero standards having a FERC applied interpretation that is not based on the clear language and formational understanding of the standard. - In addition to FERC's applied interpretations issue, NERC's RSAWS are in some cases creating additional requirements that expand the compliance obligations. RSAWS must support the requirements of a standard and should never expand beyond the clear language of the standard. - Lastly the failure to adequately address the compliance backlog is preventing the industry from having a body of audit findings to review. Having this body of work would allow registered entities to review and more completely understand its compliance obligations. These three issues are hindering the industry ability to gain a clear understanding of its compliance obligations.
29	Please forgive my directness, but if System Reliability is the true goal, it's time to recognize a few facts. It seems there is more emphasis on the amount of words written than "Keeping It Simple". Standards should be made clear and precise so folks that operate (may have no more than high school eductaion) the electric system can understand. More importantly, they must react quickly and must be able to refer to guidelines & procedures that are not wordy, but clear, precise, short and sweet. If so, then they can really concentrate on keeping the lights on. Specific Example: in PRC-004-1 the word "analyze" must refer, according to our consultants, to a long explanation of "Root Cause Analysis" before an auditor will accept the procedure. Therefore, we seem to be loosing sight of the true objective - system reliability.
30	Q2 NERC: In the majority of standards, the required performance measures are generally not clear in the standard. RSAWS can be used to provide clarification, but many times the RSAWS expand requirements not mentioned in the standard. The timely publication of audit findings would provide registered entities with a more complete understanding of compliance requirements.
31	Requirements and measures are not clear.
32	Response to this question is in context of the 'version zero' standards. In addition, EEI points out that this lower rating is a criticism of neither NERC, FERC, nor the standards development process. The 'version zero' standards were based on NERC's voluntary policies and procedures, the manner and method of satisfying the broad range of compliance obligations have been determined in that context by individual companies. Clarity and precision for performance requirements was sacrified in the 'version zero' process in order to accommodate a very aggressive development process schedule. In addition, FERC Order 693 applied interpretations that expanded the clear language of the requirement and was not supported by the body of work developed for the 'version zero' standards. As a result, some 'version zero' standards have a FERC applied interpretation that is not based on the clear language and formational understanding of the standard. Further, the NERC RSAWS are in some cases creating additional requirements that expand the compliance obligations. RSAWS must support the requirements of a standard and should never expand beyond the clear language of the standard. RSAWs must include only those requirements that have been approved by FERC as mandatory and enforceable. The compliance backlog is having an indirect effect on entities' understandings of their performance requirements. More timely enforcement actions will provide a body of enforcement case precedents that allow registered entities to review and more completely understand their compliance obligations. An example of a standard that needs improvement in this regard the Vegetation Management standard, FAC-003, is somewhat ambiguous and has resulted in different interpretations of requirements. Ambiguity should be removed from the next version which is currently being developed. These issues are hindering the industry ability to gain a clear understanding of its performance under the mandatory compliance obligations. Taking actions responsive to the EEI recommendations made in this section and the compliance enforcement section of this survey would greatly improve companies' understanding of performance expectations.
33	Some NERC standards do not contain clear definitions as to what equipment is and is not covered by the standard; therefore, the measures used to evaluate performance and compliance with these standards is not very clear to the users. WECC's interpretations of these poorly defined NERC standards is sporadic, borderline capricious, and impossible to gauge before and even after an audit. WECC's application of standards does not appear to be in line with other REs or with NERC. This yields an environment in which it is nearly impossible to run a successful compliance program with any degree of effectiveness and efficiency. The primary offending standards referred to here are the PRC standards.
34	Some requirements are not clear what is expected by the registered entities and this leads to more focus placed on compliance and less on reliability.

	Comments and recommendations:
35	Some standards are clearer than others.
36	SPP - referring to SPP Criteria is straight-forward
37	SPP is a party to the IRC Standards Review Comments, please refer to that submittal for our response to this question.
38	Standards are ambiguous and ever changing. Nobody seems to understand them.
39	Standards are straight forward with the requirments, measures and the compliance monitoring process.
40	The application or the FERC's interpretaion of the standards has resulted in some standards having an interpretation that is not based on the clear language and formational understanding of the standards. In addition, the NERC RSAWS are creating additional requirements that expand the obligations of the standards.
41	The current reliability standards were written for compliance and readiness reviews conducted by subject matter experts looking more at an entity meeting the intent of the standard combined with the specifics of the entity. As these standards move through drafting teams and interpretations are requested the revised requirements, measures and interpretations are providing the information needed for the style of audits being conducted. The standards still have quite a way to go, but they are heading the right direction.
42	The effort NERC is making on the Reliability Standards Audit Worksheets (RSAWs) and Measures is not producing clear guidance. While the RSAWs and Measures are apt to conflict, auditors often require evidence that is not called for by either the measures or the RSAWs. The Measures themselves should clearly define what is needed, but they fall far short in many cases. Many of the standards still lack them. Since the RSAWs and the Measures serve the same function, NERC should stop developing both. Instead, NERC should focus on the improving the standards' Measures. Thus, the standards themselves will guide compliance evidence. Many standards are not precisely worded to facilitate literal compliance. Consequently, auditors and entities must interpret requirements. Many standards still rely on frequently asked questions, formal interpretations or other white papers to explain the requirements of the standards. This is an indication that the clarity of the standards is still lacking. Ultimately, such ambiguity leads to uncertainty and excess, unneeded documentations that does not contribute to reliability. Clear written measures along with the requirements should provide a responsible entity the information needed to ensure compliance. The Regional Entities do not have a process for addressing clarifying questions on the reliability standards and on documented evidence raised by Regional Entities to enhance their understanding how best to effectively demonstrate compliance. In most cases, the regions are hesitant, or even refuse, to provide guidance to an entity as to whether its interpretation of a particular standard is correct. In addition, Registered Entities are exposed to risks of penalties and sanctions by asking clarifying questions to the Regional Entity about the reliability standards and compliance evidence. Proactive efforts by Registered Entities to achieve clarity and improve performance should not be exposed to risk of penalties and sanctions when done in the context of a strong compliance culture. The Regional Entities should have a timely process for answering questions on specific interpretations or evidence. This process should be open, with information sharing and consistency between regions. In the interim, Regional Entities should use "No Action Letters" or adopt other such advisory process whereby Regional Entities can be free from penalty when seeking clarity. Registered Entities must not be penalized if they find their interpretation or alternative documentation of compliance does not align with that of the Regional Entity. Instead, the Registered Entity should be provided a reasonable opportunity to modify its program or adapt its documentation.
43	The level of performance required and the measures used to evaluate performance should be more clearly stated. More importantly, there is currently no apparent direct correlation between performance and compliance. Even if an entity performs effectively to the requirements of a standard (i.e. their performance protects and maintains the reliability of the bulk power system), that entity may be found in violation of those requirements if its documentation does not conform to the expectations of NERC and/or regional entity during an audit.
44	The majority of the standards are still based on the version zero standards which were NERC's voluntary policies and procedure. The approved "version zero" standards were originally drafted for a vertically integrated utilities without taking the consideration that most registered entities are presently members of a RTO/ISOs. Without any guidance from NERC or the regions the entities have the burden to interpret the requirement applying FERC's Order 693 and NERC's RSAWS that are in some cases created additional requirements that expand the compliance obligations. To satisfy the requirements compliance obligations, Dominion developed reliability standards guideline templates to help Dominion's business units develop an overall compliance structure to the NERC Standards. The templates are intended to provide clarity to the requirements and measures of the reliability standards.

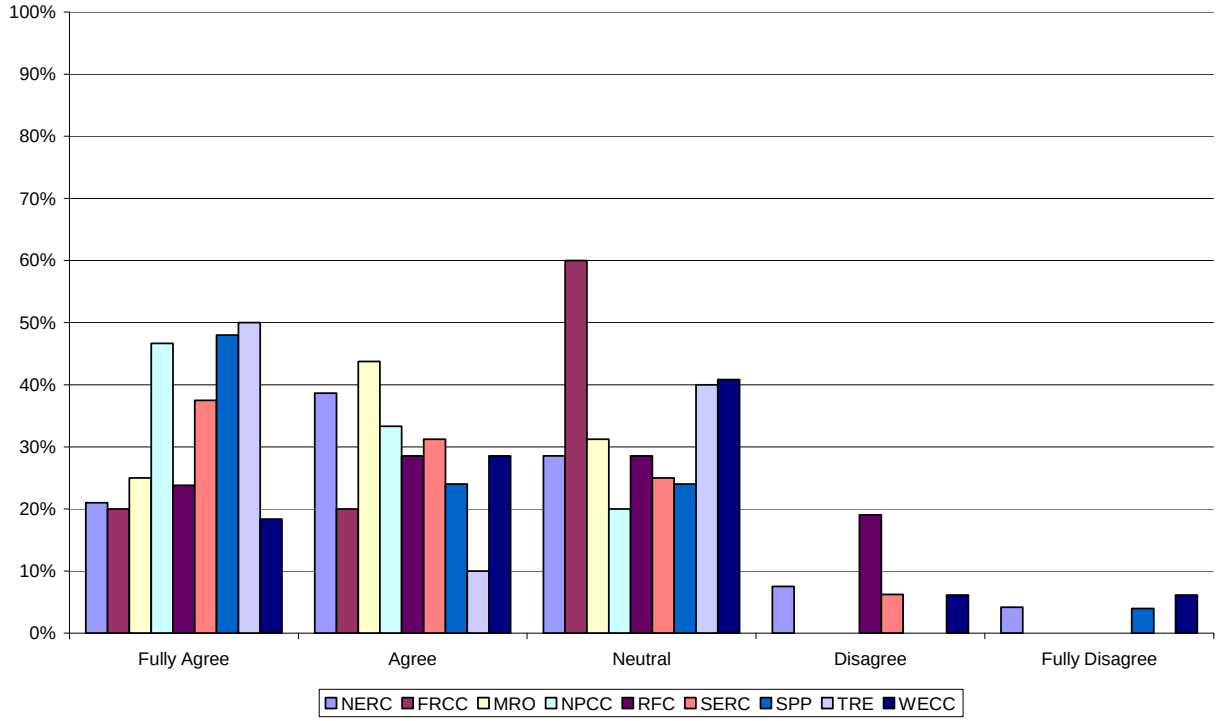
	Comments and recommendations:
45	The measures section of the standards, in many cases, do not properly identify what is required to meet an acceptable level of performance, and this creates uncertainty that should be addressed in revisions to the standards.
46	The Reliability Standards in many instances lack clarity as to what is the expected or required action or level of performance. The "measures" contained within the Reliability Standards do not consistently provide a measurement for each requirement. The guidance provided in Reliability Standards Audit Worksheets (RSAWs) is often inconsistent with the "measures" contained within the Reliability Standards. In addition, the failure to adequately address the compliance backlog is preventing the industry from having a body of audit findings to review. Having this body of work would allow registered entities to review and more completely understand its compliance obligations.
47	The version zero standards were based on NERC's voluntary policies and procedure and it's in that frame of reference that the industry has its understanding for satisfying our compliance obligations. - FERC's Order 693 applied interpretations that expanded the clear language of the requirement and was not supported by the body of work developed for the version zero standards. NERC's failure to seek rehearing on Order 693 has resulted in some version zero standards having a FERC applied interpretation that is not based on the clear language and formational understanding of the standard. - In addition to FERC's applied interpretations issue, NERC's RSAWS are in some cases creating additional requirements that expand the compliance obligations. RSAWS must support the requirements of a standard and should never expand beyond the clear language of the standard. - Lastly the failure to adequately address the compliance backlog is preventing the industry from having a body of audit findings to review. Having this body of work would allow registered entities to review and more completely understand its compliance obligations. These three issues are hindering the industry ability to gain a clear understanding of its compliance obligations.
48	The wording of certain standards leaves too much room for interpretation, and entities are given insufficient guidance regarding certain ERO/Regional Entity interpretations prior to audit/enforcement activities. See especially PRC-005-1.
49	There is a need to focus existing resources on the developement of Guidelines for compliance with existing reliability standards.
50	There is still a lot of redundancy between standards (i.e. TOP). The performance level is stated and measures are indicated but the requirements are still open to interpretation.
51	There is still a lot of room for subjectivity that relies a lot on RSAWs for clarification. RSAWs are not FERC approved and therefore may be used to alter the intent or the scope of the standards. It would be better to have more clarity in the standards.
52	They are improving but continue to need better measures.
53	Version 0 stds continue to need work, while Version 1 and subsequent revisions are much improved. APPA members have indicated that many standards particularly measures and compliance elements appear to focus exclusively on documentation requirements without clearly stating the underlying performance objective in the requirements.
54	We are only a PSE, however, most of the applicable reliability standards to not clearly state what is required of the PSE only. In the places it does have "measures", it does not properly outline what we can do to make those happen. This becomes difficult and apparant when we have spot checks or audits, because we struggle trying to determine how to show these "measures".
55	While efforts have been made to improve performance requirements and measurements, there still remains ambiguous requirements and a lack of solid measures for such requirements. A key to writing objectives/requirements is that they be actionable and measurable. SPP and TRE has not yet developed NERC standards for the "fill-in-the-blanks" standards. One concern of this "fill-in-the-blanks" by different regions does pose the risk of deriving significantly different determinations. We are further concerned that some RSAWs are expanding the requirements beyond what is prescribed in a standard.
56	While NERC is getting better in clearly indicating level of performance required and defining “measures” for each requirement in the newly developed or revised standards, some of the version zero standards do not have matching measures or the measures do not match with the intent of the requirements. An obvious question is, if the measures are clear, why do we need RSAWs? In some cases, RSAW adds extra measures or goes beyond the intent of the requirements. Similarly, in some cases, FERC Order 693 implied interpretation adds to the confusion in gaining a clear understanding of the compliance obligations of the requirements of the standard.

Select

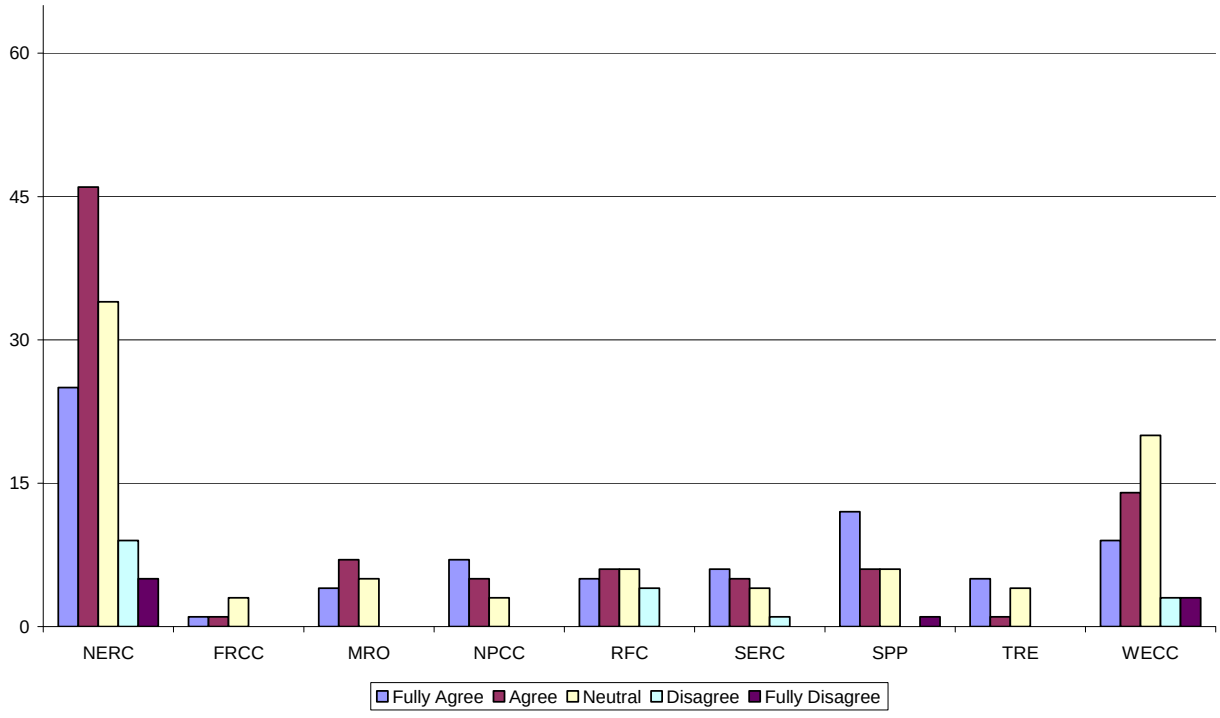
7. Requirements of reliability standards have a sound basis in engineering and operations.

	NA – Not applicable or have no opinion	1 – Fully agree	2	3 – Neutral	4	5 – Fully Disagree	Response Count
NERC	1.7% (2)	20.7% (25)	**38.0% (46)**	28.1% (34)	7.4% (9)	4.1% (5)	121
FRCC	**88.6% (39)**	2.3% (1)	2.3% (1)	6.8% (3)	0.0% (0)	0.0% (0)	44
MRO	**68.6% (35)**	7.8% (4)	13.7% (7)	9.8% (5)	0.0% (0)	0.0% (0)	51
NPCC	**68.1% (32)**	14.9% (7)	10.6% (5)	6.4% (3)	0.0% (0)	0.0% (0)	47
RFC	**60.4% (32)**	9.4% (5)	11.3% (6)	11.3% (6)	7.5% (4)	0.0% (0)	53
SERC	**69.2% (36)**	11.5% (6)	9.6% (5)	7.7% (4)	1.9% (1)	0.0% (0)	52
SPP	**56.9% (33)**	20.7% (12)	10.3% (6)	10.3% (6)	0.0% (0)	1.7% (1)	58
TRE	**77.8% (35)**	11.1% (5)	2.2% (1)	8.9% (4)	0.0% (0)	0.0% (0)	45
WECC	**34.7% (26)**	12.0% (9)	18.7% (14)	26.7% (20)	4.0% (3)	4.0% (3)	75
					Comments and recommendations:		46
						answered question	**131**
						skipped question	**11**

ERO Survey - Reliability Standards
Question 7



ERO Survey - Reliability Standards
Question 7



	Comments and recommendations:
1	All standards have sound basis in engineering and operations. However, some of the approved "version zero" standards contain good utility practices and were not written from the "auditable compliance" perspective. NERC must actively review all FERC Orders and NOPRs to ensure that any applied interpretation is based on the sound engineering and operation practices also. SERC- Has no regional standards.
2	At the core, reliability standards developed by NERC and stakeholdered with the industry often do have sound basis in engineering and operations. However, the challenge is primarily in certain requirements that have been mandated by FERC that appear to meet other objectives (comparability, nuclear plant safety, etc.) as opposed to meeting the sole objective of ensuring reliability of the interconnected system. Many of the requirements are bulk carry-forward from the previous NERC Policies, and should not be requirements at all. In many cases they are explanatory text that was labeled with "Rs" in the conversion process. Many others are administrative or procedural in nature or reflective of "good utility practice" or previous "guidelines". The standards should be condensed to their core requirements. .
3	EEI believes that some of the approved 'version zero' reliability standards need to be reevaluated. For example, PRC-001 is a reliability standard that contains good utility practices but may not rise to the level of requring an enforceable reliability standard. Newer standards going through the process or those that have been recently approved by the industry are based on sound engineering and operational practices. FERC applied interpretations do not receive the same level of review and discussion and are not always grounded in sound engineering and operations. NERC must actively review all FERC Orders and NOPRs and challenge any applied interpretation that is not supported by the standards filling. For example, NERC should ask whether an interpretation fully addressed in the standards development process, whether a FERC interpretation expands or modifies the clear language of the requirements, or whether an interpretation is based on sound engineering and operations.
4	Excluding NUC-001-1 most revised standards that have being recently approved by the stakeholder process are based on sound engineering and operational practices. The approved "version zero" reliability standards need to be reevaluated. The industry is aware that NERC have several standards projects open for revision and the NERC's ANSI – accredited standards development process as defined in the Reliability Standards Development Procedure process seems to be productive within the stakeholder process. NUC-001-1 Nuclear Plant Interface Coordination is simply a Coordination Agreement between the various transmission entities without any basis in engineering or operations.
5	For the most part, yes; the revision of some standards might be useful to ease their interpretation for compliance.
6	Fully disagree. Achieving an "Adequate Level of Reliability" of the electric system is the overall goal behind the reliability standards. The reliability standards ultimately direct utilities, power producers, and others to spend billions of dollars annually, costs that are eventually borne by end-use electric customers. If the goal is not defined correctly, or focused appropriately, the resulting standards could be insufficient to prevent multi-state cascading outages with significant economic impacts and potentially adverse impacts to personal safety and well being. Conversely, misapplication of the goal can result in costly efforts that provide little to no benefits on increasing or maintaining reliability. The current trend appears to be the former, where the goal of an "Adequate Level of Reliability" is creeping so far into local service concerns that the efforts undertaken to comply ultimately have no impact on overall system reliability. This trend is largely the result of a move away from an impact-based definition and towards a "bright line" definition of the Bulk Electric System. Bulk Electric and Transmission Systems As the paper notes, NERC has traditionally defined reliability based on the overall adequacy and security (operating reliability) of the Bulk Electric System. While the paper notes that NERC will continue to utilize these two concepts in its Adequacy definition, the paper does not address the transition that has taken place over the past three to four years. This transition has been fueled by changes to the definition and applicability of the term Bulk Transmission System (Bulk

	Comments and recommendations:
	Electric System or Bulk Power System), which is used in both of the Adequacy and Operating Reliability definitions. A comparison of the past and present definitions illustrates this change. The Glossary of Terms reference document approved by both the NERC Engineering Committee and Operating Committee at the July 16, 1996 Joint EC/OC Meeting defined the Bulk Electric System as: Bulk Electric System — A term commonly applied to the portion of an electric utility system that encompasses the electrical generation resources and bulk transmission system. Where Transmission — An interconnected group of lines and associated equipment for the movement or transfer of electric energy between points of supply and points at which it is transformed for delivery to customers or is delivered to other electric systems. Bulk Transmission — A functional or voltage classification relating to the higher voltage portion of the transmission system. Subtransmission — A functional or voltage classification relating to the lower voltage portion of the transmission system. In addition there was a definition of Local Network that further distinguished sub-transmission systems and is currently used in the NERC TPL Reliability Standard. The latest version of these NERC definitions define the Bulk Electric System as: Bulk Electric System — As defined by the Regional Reliability Organization, the electrical generation resources, transmission lines, interconnections with neighboring systems, and associated equipment, generally operated at voltages of 100 kV or higher. Radial transmission facilities serving only load with one transmission source are generally not included in this definition. Transmission line — A system of structures, wires, insulators and associated hardware that carry electric energy from one point to another in an electric power system. Lines are operated at relatively high voltages varying from 69 kV up to 765 kV, and are capable of transmitting large quantities of electricity over long distances. Transmission — the definition is unchanged The scope, granularity, and interpretation of what constituted a Bulk Transmission or Bulk Electric System have changed significantly. Rather than the general definition used by NERC in 1996, which resulted in emphasis on Adequacy and Security, the definition of Bulk Electric System has moved toward a bright line of non-radial lines operated at 100 kV or higher and transmission lines 69 kV and higher. This bright line definition, combined with other amendments to NERC Reliability Standards and the NERC glossary have resulted in a major shift in the applicability of reliability standards from regional (wide-area) system reliability issues to local Level of Service ("LOS") requirements. Change in Focus Historically (pre-2003), protecting the electric system from wide-spread (cascading) outages, protecting equipment, and isolating cascading outages were the primary goals of NERC reliability efforts. These goals were implemented by knowledgeable, experienced electric industry staff that used standards, guidelines, and system models to ensure that the electric system was planned and operated to work during normal and abnormal conditions. As the NERC paper articulates, the standards were intended to ensure that the operation of the electric system met the following goals: 1. Remaining within acceptable limits; 2. Performing acceptably after credible contingencies; 3. Limiting instability and cascading outages;, 4. Protecting facilities from severe damage; and 5. Restoring system integrity. The historical analysis and modeling efforts that took place demonstrated vulnerabilities to the system caused by potential system outages and identified safe operating points where the system could operate securely (for the operating horizon) and adequately (for the planning horizon). As better tools and more computing power became available, additional scenarios were reviewed and evaluated. The increased combinations and permutation (order dependent) of outage scenarios could now approach infinity. As a result, standards required the use of judgment in defining limits, scenarios, and scope. Narrowing the scope of what are credible outages and allowing the electric industry to focus on addressing system events that could result in wide-spread cascading was a realistic goal. It became clear that 100 percent reliability was not a realistic or a cost-effective option. However, it was reasonable to focus efforts on addressing issues that could cause cascading events on multi-state or large region-wide electric systems, rather than to focus on local LOS issues. The scope of NERC and other regional reliability standards, policies, and guidelines did not focus on local LOS issues that impacted small area outage risk. Standards and guidelines that addressed local LOS issues were defined and approved by individual electric utilities, local commissions, and state PUC's based on their customers' expectations. Where underlying systems, Local Networks, sub-transmission, or other appropriate terms that describe local load service facilities were identified as potentially causing or exacerbating wide-spread cascading events. They were included on the appropriate regional critical facilities list. This list of critical facilities was reviewed periodically and was included in the regional system efforts. This historical focus on impacts is much different than the current process due in a large part to the Bulk Electric System definition that includes a 100 kV bright line threshold. Factors that Impacted Electric Industry Reliability The historical efforts made by the electric industry to address reliability were not without flaws. Nuances in interpretations of the standards were a problem in the past and will likely carry over into the future. The industry experienced problems with open communication and data exchanges in planning forums, particularly following the release of FERC

	Comments and recommendations:
	Orders 888 and 889. Communication and data exchanges became more contentious, and in many cases did not occur at all, due to the potentially sensitive merchant information involved. Overall cooperation and concerns regarding rate recovery further reduced facility additions and investment in the electric system. All of these factors impacted wide-area reliability issues and may have been some of the root causes to a number of the large outages experienced in North America over the past decade. Some believe these outage were caused by the three "Ts": trees, tools, and training. Others believe that better communication between electric industry sectors and adequate funding would have resulted in better tree trimming practices, tools, and training. Numerous environmental issues have also impacted reliability in the electric industry. New and more onerous environmental regulations addressing facility siting, resource portfolio requirements and biological operating requirements have increased the risk of expanding transmission, adding new resources, and operating existing resources. These regulatory risks coupled with uncertain rate recovery have significantly reduced transmission expansion in North America over the past 15 to 20 years -- effectively the time leading up to the passage of the Energy Policy Act of 1992. Response to Multi-State Outages In 1996, the Western Interconnection was impacted by two large multi-state outages and avoided a third outage by dropping a large load area. In 2003, a large part of the Eastern Interconnection blacked out. As expected, the response placed of the U.S. and Canadian governments, industry, and the public placed a significant emphasis on reliability compliance. This triggered significant changes in the electric industry reliability environment. The most significant change was a transition from a voluntary to mandatory compliance model. In addition, it accelerated the Version 0 process of translating the NERC operating policies and planning guidelines into mandatory NERC reliability standards and moved the Functional Model forward. After the dust settled, we learned that most of the electric utilities and other facility owners involved in the disturbances met all of the applicable standards. However, some did not, contributing to the multi-state outage. Approximately two years after the 2003 Eastern Interconnection outage the Energy Policy Act of 2005 paved the road for electric industry mandatory compliance with penalties for non-compliance. Overall, this effort was supported by the public and most of the electric industry because it would provide a forcing mechanism to promote electric system reliability and reduce or possibly eliminate the multi-state outages caused by non-compliance. Reliability Optics The process began with the initial NERC Functional Model registration process for the Regional Reliability Organizations, Balancing Authorities, and Transmission Operators. By 2007, all owners, operators, and users of the Bulk Electric System were expected to register under the appropriate function. Registration was based on the NERC Statement of Compliance Registry Criteria (Revision 3) that uses generation thresholds of 20 aMW and load thresholds of 25 aMW as bright line tests for registration and reliability standard compliance. As a result, many small organizations who had never previously engaged in electric industry reliability efforts were required to register and identify which of the 1,400 NERC reliability requirements were applicable to their systems. This was a significant change in electric industry effort, forcing many to address a myriad of requirements that ultimately have no material impact on widespread reliability issues. These changes have significantly affected the attitude of the electric industry towards the NERC reliability standards, and are detracting from the efforts of the limited knowledgeable electric industry personnel to add system reinforcements that positively impact reliability. The District, like many distribution and local network systems, is exposed to various outage risks. For the District, the loss of 5 to 25 MW is comparable to a "car-pole accident" or "equipment failure", and the loss of 200 to 300 MW load for two to four hours is typical for a "wind event". With the new bright line test, these may become national security issues requiring significant documentation and reporting to NERC, and the DOE with pending investigations and possible fines. Utilities have always taken measure to cost-effectively reduce exposure to local system outages through system networking, implementing more efficient restoration processes, vegetation management, SCADA implementation, and other methods. However, these measures are taken to address local LOS issues, as they pose no risk of wide-spread or multi-state cascading transmission outages. It is unclear at what point impacts to distribution systems and Local Networks that provide service to a local area became regional reliability issues. However, many of the NERC definitions, standards, interpretations, and changes have made local service levels and regional reliability issues non-distinguishable. Electric Industry Reaction Whether NERC has shifted its focus or simply increased the number and detail of the requirements, the effort required to simply document compliance has increased exponentially. Shrinking experienced staff, increasing compliance obligations, and the threat of large fines have forced utilities to focus on forming internal compliance programs rather than on building transmission and developing resources that reduce the risk of wide-spread outages and meet the future needs of end-use customers. As a result of this work load and the growing confusion over applicability of NERC reliability standards requirements, the consulting business is thriving. In fact, some consultants appear to be going out of their way to sensationalize risk and promote more business. This became especially evident following

	Comments and recommendations:
	the CNN report on generation vulnerability. Removing protection from a generator and allowing it to over-speed and fail is no more revolutionary than cutting the break lines on a car and watching it crash – it ultimately has little to no bearing on the impact to reliability of the regional system. These types of "Chicken Little -the sky is falling" scenarios detract from serious efforts to secure physical and cyber assets that could impact the wide-area system. Inevitably following these media blitzes are numerous calls for increased surveillance at substations, larger fences, and adding security guards to distribution substations. This reaction occurs despite evidence from studies and actual experience that the removal of a particular station from service will only impact the LOS in the immediate area and recovery through switching and other means would be expected in two to eight hours. At a recent reliability workshop, an expert consultant recommended that a number of small, "full-requirements" utilities build bunkered control centers to comply with NERC. The consultant felt this was necessary because the utilities own and operate networked 115kV lines that were included within the definition of the Bulk Electric System. This position was posited despite the fact that studies have demonstrated that removal of this line would not impact the regional system – the only impact was to the approximately 10,000 end-use customers served by the 115kV circuit. An alternative solution to meet the requirements was to operate the system "open-loop" or radially, but this would reduce local LOS, increase losses, and accelerate the need for additional facilities. In summary, the actions advocated by consultants and justified by the application of NERC reliability standards without regard to actual impacts serves to increase the electric utilities' and customers' costs and reduce their LOS. This issue also impacts large transmission provider utilities because most also own and operate local networks and load serving systems that if removed only impact local load. Further, customers of larger electric utilities are looking to them for interpretations, delegation agreements, and other support, significantly detracting from their efforts to meet the reliability requirements that may directly impact regional reliability. Recommendation: It is clear that the cost of wide-spread multi-states outages to our lives, economy, and security is significant. Few, if any, would argue that addressing this issue is not of the utmost importance. However, the industry is experiencing a significant drain on a very limited resource (qualified and experienced electric industry staff), who are not able to focus on the concrete actions that will ultimately deliver the reliability the system needs. Instead, many are focusing on documentation, analysis, operation, and protection of local systems that only impact local area LOS issues, without significant risk of wide-spread, multi-state outages. To more efficiently utilize electric industry resources, NERC should refine reliability standards and the defined terms that are used in the standards glossary to better identify reliability efforts that focus on preventing region-wide cascading rather than requirements that impact local load service. This effort would go a long way in prioritizing a limited labor resource, which is shrinking every day, on efforts that would promote regional reliability rather than local service levels that are already being addressed by agencies. NERC can begin by defining "Adequate Level of Reliability" based on impacts to the regional system, and moving away from bright line tests that sweep in LOS issues.
7	I would say true for most. I believe you have a problem unfolding for you standards that apply to a BA and a TOP. Traditionally in the west, the BA and the TOP were the same entity. As such, many of the control area operations issues are applicable to the BA as well as the TOP. I suspect this was done since there were few differences in these organizations within the vertically integrated utility world. Lately, some of the larger TOP/BAs are stepping back from their original designation of a TOP for an embedded small transmission system within their larger TOP/BA area. I believe this is happening because they do not want to be liable for fines and sanctions resulting from operational issues on the small transmission owner's system. This is creating some problems. The many of the objects of the standards (i.e. UFLS, UVLS, SPS, Sysrtem Disturbance, etc) are tasks that small transmission owerns cannot perform. These standards once had a "sound basis in engineering and operations" however, I believe that basis is starting to erode. NERC and WECC need to start recognizing the small transmission owner as a TOP that is limited in what it actually can do.
8	IF there is a sound basis in engineering I do not see many references to the material.
9	It is recommended that a section be added to the RSDP requiring that every SDT conduct an analysis of existing standards to insure that the requirements of their standard does not over lap or is not redundant with any other existing standard requirement. The section of the RSDP also require a risk assessment that the requirement that they are proposing is needed to adequate level of reliability as opposed to a nice to have or sounds good basis.

	Comments and recommendations:
10	It's our opinion that some of the approved "version zero" reliability standards need to be reevaluated. PRC-001 is an example of a reliability standard which contains good utility practices but does not necessary raise to the enforceable reliability standard justification. Newer standards going through the process or those that have been recently approved by the industry are based on sound engineering and operational practices. FERC applied interpretations do not receive the same level of review and discussion and are not always grounded in sound engineering and operations. NERC must actively review all FERC Orders and NOPRs and challenge any applied interpretation that is not supported by the standards filling. (Was the interpretation addressed in the standards development process? Is the FERC interpretation expanding or modifying the clear language of the requirements? Is the interpretation based on sound engineering and operations?)
11	It's our opinion that some of the approved "Version Zero" reliability standards need to be reevaluated. PRC-001 is an example of a reliability standard which contains good utility practices but does not necessary raise to the enforceable reliability standard justification. Newer standards going through the process or those that have been recently approved by the industry are based on sound engineering and operational practices. FERC applied interpretations do not receive the same level of review and discussion and are not always grounded in sound engineering and operations. NERC must actively review all FERC Orders and NOPRs and challenge any applied interpretation that is not supported by the standards filling. Examples of questions that NERC should ask are as follows: Was the interpretation addressed in the standards development process? Is the FERC interpretation expanding or modifying the clear language of the requirements? Is the interpretation based on sound engineering and operations? RFC is currently drafting regional standards for Under Frequency Load Shedding as well as Disturbance Monitoring. Exelon is concerned that certain provisions in these draft RFC regional standards may be inconsistent with NERC standards and may not have adequate technical justification.
12	Mandatory standards do not adequately take merchant genreation into consideration.
13	Many requirements are statements of the obvious or are so vague that compliance becomes focused on definitions or interpretations. Many requirements involve trying to prove a negative
14	Most reliability standards are common sense and are based on solid engineering and operations while there are some standards that have little basis and if not complied with would have little if any impact to the bulk electric system.
15	Most requirements establish documentation obligations and appear to have little direct engineering basis. Compliance with the requirements of many standards actually diverts resources toward the development and management of documentation. These resources could otherwise be available to provide for reliable operations. Only larger vertically integrated utilities have sufficient staff resources to effectively participate in the standards development process to ensure that standards are sufficiently based on sound engineering.
16	NERC Reliability standards developed by NERC and stakeholdered with the industry do have sound basis in engineering and operations. However, the challenge is primarily in certain requirements that have been mandated by FERC that appear to meet other objectives (comparability, nuclear plant safety, etc.) as opposed to meeting the sole objective of ensuring reliability of the interconnected system. NPCC NPCC criteria have sound basis in engineering and operations. NPCC criteria are established by industry led task forces like the Task Force for System Studies (TFSS) and working groups like the SS-38, which is also led by the industry. The performance-based definition of the BES used within NPCC is one such example that has proved appropriate. However the benefits of this approach will be eroded with little if any reliability gain, if the proposed “bright-line” definition is imposed.

	Comments and recommendations:
17	NERC Standards development continues to be supported with the NERC process by the efforts and technical expertise from those within the industry who are best qualified and trained to design and detail bulk power system reliability standards. The NERC standards development process must be preserved in order to continue to ensure that the standards provide technically sound and effective requirements. The bulk power system is a massive collection of complex, high voltage electrical elements operating in real-time that must be carefully managed. The reliability standards are the foundation for planning, operating and maintaining these elements within the bulk power system. NERC must take decisive action in cases where there is not a technically sound basis for a new or modified standard proposal. NERC holds both the technical and enforcement responsibilities and must ensure that no one outside or within the standard development process is unduly influencing the outcome of standards which cannot be supported from a sound engineering, planning, operating or maintenance basis. NERC must be allowed to continue with an ANSI accredited standards development process.
18	NERC and FERC need to provide better direction to drafting teams when their technical judgments conflict or at least do not clearly reflect the wording in the order. Some current drafting teams feel obligated to write standards based on the guidance in the FERC orders even if it conflicts with their unbiased professional expertise.
19	NERC's standards appear to be more or less based in sound engineering and operational concepts and philosophies. WECC's application of some standards does not meet this criteria. WECC's implementation of some standards is not reasonable in some cases and does not appear to have any foundation or basis at all other than a desire to have every element, no matter how small and insignificant, under their watch.
20	NERC-The Version 0 standards came from operating policies and planning standards that in many cases were developed without rigorous technical and engineering analysis. While operating policies and planning guides have generally worked well to protect reliability in an era of voluntary compliance, more rigor is needed in standards that involve legal enforcement and potential legal challenges to the technical basis for such standards. RFC- As an example of an unclear technical basis for a standard, the RFC MOD-024-RFC-1 Standard Drafting Team provides an engineering basis that has some merit for the differences between this standard and the PJM testing requirements. The PJM testing requirements also hold merit and have a technical basis. MOD-024-RFC-1 requires fossil and nuclear units to test for four hours and PJM requires a two hour test for the same units. The testing period of these units should be the same for both with a sound basis in engineering given on why that testing period was selected.
21	Not all entities have staff with engineering & operations degrees. It would be nice if the standards were put in laymen terms so everyone can fully understand what the standards are asking for. Give examples & make the standards to the point.
22	Overall, the Reliability Standards are formulated on sound engineering and operations. We do have a concern with those requirements that are more administrative in nature which contribute little or none to bulk power system reliability. Those requirements that are administrative in nature should be highlighted during the mandatory review periods for each standards and possible removed from the standards.
23	See above comments.
24	Several proposed RFC reliability standards include or have included expansion of NERC Compliance Registry Criteria. A directive is needed to the RE's to not expand the NERC Compliance Registry Criteria through the Applicability Section of a proposed reliability standard. Also, IMEA would like to see RFC take a more reasonable interpretation when applying the radial exemption to the need for TO registration.

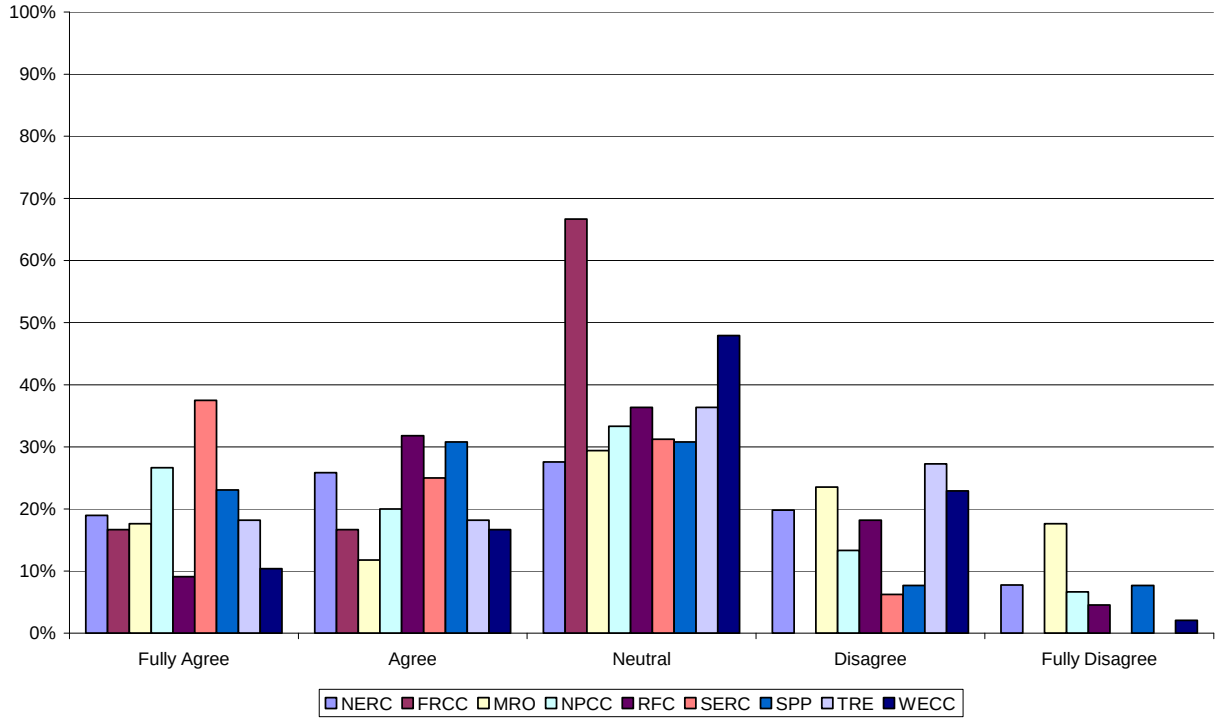
	Comments and recommendations:
25	some of the reliability standards are confusing as some of them directly apply to our organization and some do not. Even the reliability standards that do apply can be left open to interpretaion differently.
26	Some reliability standards reflect industry needs for business practices and technical coordination across responsible entities. These requirements may have a sound technical basis, but should not be reliability standards.
27	Some standards do not allow for special circumstances such as a GO/GOP who owns a small interconnection line and is now considered as a TO/TOP.
28	Some standards use ambiguous wording that is not clear or concise. Some requirements state you need to have a procedure but an auditor wants a procedures formatted, signed, ect. which is not stated in the requirement. Meeting the requirement is one aspect of compliance. The burden of proof on an entity is overwhelming. Doyle I, LLC was found to be non compliant with CIP-001-1, R4 because they didn't have proof of "establishing" contact with the FBI. They had the phone number, but no written proof of calling it. Not to say the number was not correct. We know that the emergency phone number in many places in the USA is 9-1-1. Should everybody dail that number to make sure it works? Doyle I, LLC's non compliance resulted in a 44 page mitigation plan. A lot of Doyle I, LLC, SERC, NERC and FERC's energy went into those 44 pages. Just because someone didn't dial a phone number. We generate a lot of paper work but does this enhance the real time reliability of the BES? The awareness is great with system operators when there is an event on the system. The real question to NERC is does the FBI (or RCMP) know what to do when an event happens?
29	Sometimes. There should be a cost/benefit analysis performed on each standard. Some standards clearly are needed to improve reliability, while others (especially certain CIP standards) are a burden on entities. Much of the effort an entity expends simply to document compliance can often be better spent planning and operating the system.
30	SPP is a party to the IRC Standards Review Comments, please refer to that submittal for our response to this question.
31	Standards are written by transmission experts with limited knowledge of generation operations. The standards are written with the expectation that generators never have forced outages.
32	The heavy involvement by industry experts in the standards development process contributes to the quality of the standards.
33	The implementation of standards/requirements in certain situations can actually weaken reliability of the bulk electric system. In many cases, the requirements are driven by historical practice rather than sound engineering. In attempting to find a "one size fits all" approach to continent wide standards, NERC is creating situations where complying to the standards goes against sound engineering and operations. The stakeholder development process is contributing to the "lowest common denominator" standards that entities are now compelled to follow. Stakeholder interests are superceding technical expertise which is preventing the development of standards based on sound engineering. FERC is also directing changes to the standards that have no basis in engineering.
34	The standards drafting teams are composed of technical experts and are doing a good job of creating new or revising standards. Work is needed on standards that were created as Version 0 standards, as they were converted from previous operating policies, etc.
35	The standards need to be set in a way that the testing and maintenance can be performed in a safe and timely manner with a wide range of configurations.

	Comments and recommendations:
36	There are many requirements which are not based at all in engineering and operations but are instead administrative. While such administrative requirements are useful as aids to reliability, they should be separated from key reliability standards that do have a sound basis in engineering and operations. Additionally, some standards do not sufficiently account for differences in the engineering and operational basis that exist between generation facilities and transmission facilities. NERC should revisit the basis for requirements that it applies to both GO/GOP and TO/TOP.
37	There are multiple conflicts with the ERCOT Operating Guides and Protocols.
38	There is alot of duplications and repetition from one standard to another.
39	There is consistently a sound engineering and/or operational basis for NERC's standards. However, the need to apply specific requirements of a given standard to entities, as defined in the Functional Model, is not always as thoroughly considered. There are a number of examples where a standard that has been drafted to address a particular reliability function ends up impacting multiple Responsible Entities. While this may have been workable in an environment of voluntary compliance by predominately integrated utilities, it is much more difficult to apply in an environment of unbundled functions and mandatory compliance. In the current environment, in addition to the sound engineering basis there needs to be an identifiable reliability gap which a specific entity is expected to fill in compliance with a given standard. Compliance is generally evidenced/proven via documentation. The NERC standards and requirements could be more straight-forward by providing: 1) examples of documentation that can be used to substantiate compliance, and 2) a "right-click" web-link that provides quick access to the clarifications provided by the regional entities or NERC to industry participants in clarifying requirements.
40	This is generally the case with a few exceptions.
41	To the extent that the standards are based on sound engineering and operational practices and not muddy by the adoption of the FERC staff interpretaion. Prior to implementation, FERC interpretaions should go through the same process of scrutiny as the standards themselves.
42	We believe that the requirements are generally sound. There does appears to be a tendency for the SDT's to incorporate what might be considered best practices into requirements. It is not feasible or necessary for every organization to implement best practices in every area of reliability, and should not be made law. The focus of the standards should be on enforcing acceptable levels that the industry must meet, while encouraging organizations to strive for best practices where appropriate to reduce risk further.
43	WECC and NERC are trying to establish a sound engineering basis for standards but that does not always translate into clear performance standards. Please see response to Q2 above.
44	While technical expertise of the drafting teams with the benefit of stakeholder review ensures a sound basis, the specification of documentation does not necessarily meet the bar for assuring reliability of the BES. RFC's standards development teams have demonstrated exceptional engineering knowledge as standards are developed. Just as others are experiencing, there appears to have been a decline of technical talent of staff at NERC and RFC over that last several years. It would be helpful to re-build that capability. Perhaps as the culture of compliance is evaluated during a violation, participation in drafting teams should be given appropriate weighting such that it provides a greater incentive for technical experts to participate.
45	While the intent is sound, operations differ from region to region, entity to entity. The applicabilty of Standards to entities who are members of an RTO or ISO can become irrelevant to the downstream entity.
46	While they may be based on sound engineering practice, they don't always apply uniformly across the range of registered entities based on their individual sizes and complexities.

8. Standards development process to date has resulted in timely development and modification of standards.

	NA – Not applicable or have no opinion	1 – Fully agree	2	3 – Neutral	4	5 – Fully Disagree	Response Count
NERC	4.9% (6)	18.0% (22)	24.6% (30)	**26.2% (32)**	18.9% (23)	7.4% (9)	122
FRCC	**87.0% (40)**	2.2% (1)	2.2% (1)	8.7% (4)	0.0% (0)	0.0% (0)	46
MRO	**67.3% (35)**	5.8% (3)	3.8% (2)	9.6% (5)	7.7% (4)	5.8% (3)	52
NPCC	**69.4% (34)**	8.2% (4)	6.1% (3)	10.2% (5)	4.1% (2)	2.0% (1)	49
RFC	**59.3% (32)**	3.7% (2)	13.0% (7)	14.8% (8)	7.4% (4)	1.9% (1)	54
SERC	**69.2% (36)**	11.5% (6)	7.7% (4)	9.6% (5)	1.9% (1)	0.0% (0)	52
SPP	**55.2% (32)**	10.3% (6)	13.8% (8)	13.8% (8)	3.4% (2)	3.4% (2)	58
TRE	**75.6% (34)**	4.4% (2)	4.4% (2)	8.9% (4)	6.7% (3)	0.0% (0)	45
WECC	**36.0% (27)**	6.7% (5)	10.7% (8)	30.7% (23)	14.7% (11)	1.3% (1)	75
					Comments and recommendations:		50
						answered question	**132**
						skipped question	**10**

ERO Survey - Reliability Standards
Question 8



ERO Survey - Reliability Standards
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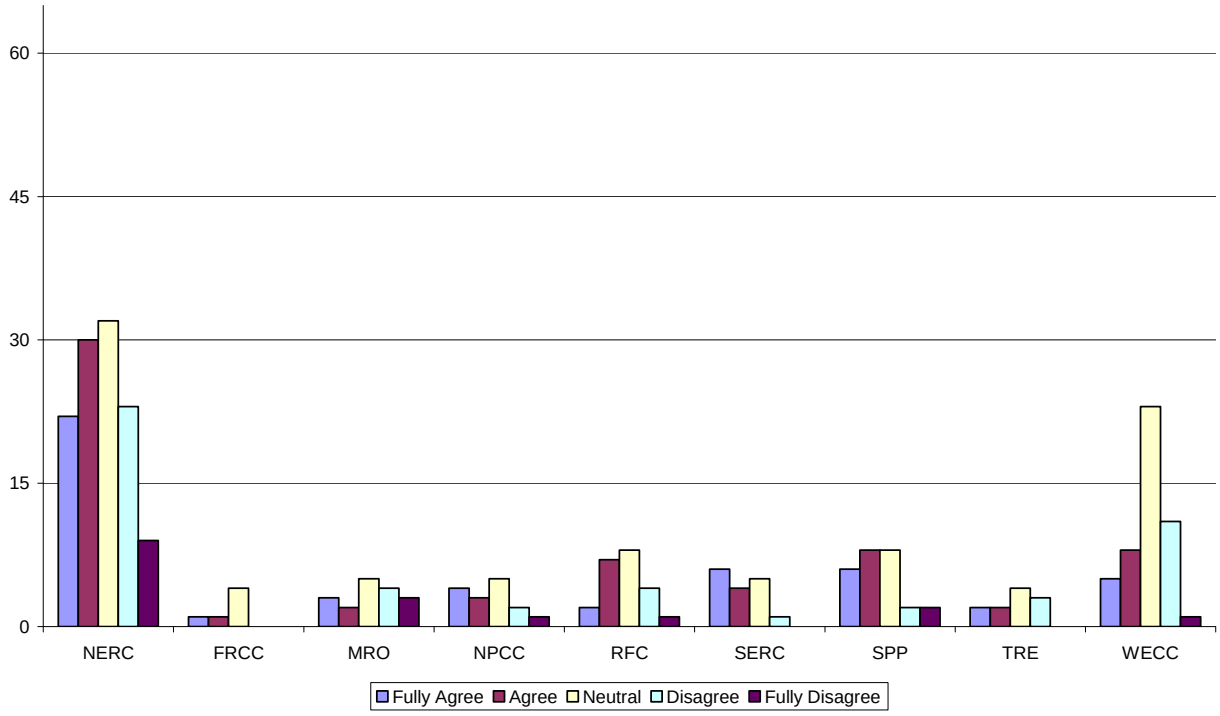


	Comments and recommendations:
1	1. Standards were perhaps developed too quickly given the fact that so many are back in committee or require interpretation.
2	A proposed regional reliability standard should be held if posting of the proposed corresponding NERC continent-wide reliability standard is imminent. Also, there is some confusion with multiple versions of the same NERC continent-wide reliability standard in different stages of the standards development process.
3	Adequate time is needed to ensure quality standards are developed.
4	Although there is a major work to be done, the standards development process is effective and has an aggressive NERC Reliability Standards Development Plan.
5	An impressive amount of work has been achieved in the past few years, however on a few occassions it appeared as though process was short circuited to meet FERC time lines. (Not sure that there is a good solution to this)
6	As a stakeholder driven process, standards development is inherently slow. Unfortunately, the pace of development is further affected by regulatory bodies. Directives contained in FERC orders regarding proposed reliability standards and the hands-on participation of FERC staff in the development process is interfering with attempts to balance different needs and concerns as well as incorporate sound engineering and operations into the body of the standards.
7	As NERC acknowledged in its self-assessment, certain standard development projects have generally exceeded their 12-month target completion period. The industry has difficulty in knowing when the standards will be issued and made effective because of extensive delays at various stages in the development process.
8	Comments on proposed standards are frequently not addressed, with apparently hoping they will be overlooked in subsequent drafts.
9	Currently the standard development process is lengthy. If possible, NERC should endeavor to shorten the time period required to develop standards.
10	Development of Standards through due process is complex and time-consuming, but this is necessary to maintain the integrity of the process.
11	I only know of one SPP Regional Standard under development (UFLS) and there hasn't been much progress that I know of.
12	I think the process is too long. Once a reliability standard is approved, it is not clearly defined on the website. I wish all entities got clear, understandable e-mail updates when new standards are approved.
13	I would like to see the process move much quicker, but have no recommendations on how to accomplish that without degrading the effectiveness of the process.

	Comments and recommendations:
14	It has been a struggle to understand all requirements and then adjust our data to fit into NERC/WECC's format. Most standards follow the process. However, we are still waiting on development and some follow-up on others. The initial conversion from policies to standards was timely. However, as the process has progressed, standards keep changing. It is difficult to keep up with the moving target (i.e. EOP and PER standards). Most engineers are not able to spend enough time studying the standards or modifications to the standards and their impact to their own utility. WECC is providing enough time and notice however there are only so many people that understand things like protective relaying, PSS's, etc and these are the same people expected to keep things running as well as comment on modifications to standards. They are also the ones who must document performance of the standards and there is only so much time available. Therefore, comments often go unmade and it is only a matter of time before a change is missed.
15	NERC Standards development is a process that is inherently time consuming due to the same issues mentioned in Standards Question #3 above. The bulk power system is a large, complex electric network that no one person or entity can provide full expertise for its planning and operation. It requires a collective set of industry-wide participants, collaboratively working toward a technically sound set of standards that support the reliability of the bulk power system. NERC has facilitated a large number of standard modifications and continues to outline future standard development and modification within the annual work plan. The work plan continues to change and grow in order to effectively address changing requirements – whether from regulatory directives, system events or general bulk power system reliability improvements. The timeliness of standards development has been on course given the extensive work scope. Providing technically sound standards that are enforceable takes considerable time to develop and NERC has done a commendable job managing the standards development efforts. NERC has also worked to help streamline the process in order to more effectively produce a timely, technically sound and enforceable product. NERC must provide, as stated in Standards Question #2, training for drafting teams that will maintain effective, efficient and technically sound standards development.
16	NERC The primary emphasis should be on the quality of the requirements, with considerations of speed taking on a somewhat lesser significance. In urgent action situations which require speedy development of standards, a different approach will obviously be indicated. The key to producing effective standards and winning industry buy-in, is to achieve the right balance. It is our respectful view that at present, the balance is not right. A less ambitious standards development program should be adopted by NERC, with clear priorities that take into account stakeholder input. Realistic goals and timelines, should then be set that recognize the capacity of industry participants to meaningfully contribute to the standards development process. In this regard, NERC's project management must be strengthened to ensure that those projects that are committed to, do get completed on time. Further, the planning and scheduling of standards development work should include an appropriate buffer to allow for interpretation requests and other requests from industry as well as regulatory directives NERC also needs to ensure that it coordinates with all the regions with respect to their individual regional standards development processes. NPCC NPCC criteria were established prior to the creation of the ERO and these have proven to be effective. However NPCC has been slow in developing regional reliability standards.
17	NERC has administered the current process well. The process does not afford "timely" development, if timely implies that all standards are to be developed quickly. On the other hand, it appears that the interpretation takes a long time. NERC should look for opportunities to optimize the process within the frame work of stake-holders' participation and ANSI accreditation.
18	NERC has established a work plan to review standards for modifications/revisions. Current stakeholders process (Regional Standards Committee and NERC Standards Committee) allows for input from the industry.

	Comments and recommendations:
19	NERC has the task of creating and revising standards that can be adopted and implemented on a North America-wide basis, and should continue to use the open standard development process without undue influence from any entity. The process itself takes a considerable amount of time to follow all the steps in the ANSI-approved process, however it is important that the scope of input continues and that sound standards are created. Therefore, if it takes more time to develop a quality standard, this is acceptable.
20	NERC- NERC is working to improve the process and should be allowed to continue this effort with stakeholders input. NERC needs to improve in the following areas: work on prioritizing standards; elimination of unneeded standards; making needed standards clearer; developing new standards sparingly; streamlining the process; retaining the ANSI process but investigating ways to make it more efficient; continuing to rely on industry technical experts, not attorneys or regulators, to develop technically sound standards; and, considering clarity of compliance and enforcement provisions within standards. RFC-RFC and NERC are working on the same standards at the same time, which makes the standards process very inefficient and more costly to the stakeholders. RFC should wait until the NERC standard is approved by FERC to see if a need is present to have a regional standard. Other regional entities are waiting for the NERC standards to be FERC-approved before working on and/or passing a regional standard. If this practice were followed, it would prevent much confusion for the entities subject to standards.
21	NERC's development process, while based on a highly credible method of standards development, is not very fast and has not seemed to be able to produce new, revised, and/or corrected standards as quickly as has sometimes been needed. A major challenge to NERC going forward will be to continue to take advantage of industry and public expertise and input to the degree that they are while greatly increasing the speed of standards development. WECC seems to implement criteria above and beyond that in the approved standards at will and without any outside input as to feasibility, practicality, and necessity of these criteria. Then, when a fast decision is needed as to what criteria will actually be applied in determining compliance with a standard, they seem to do nothing.
22	Nomenclature for standard VAR-002-1-1a seems inconsistent with defined naming conventions, Additionally, all versions of a standard are retained on the NERC web site. Finding the most recent version of a standard that has numerous revisions is difficult.
23	Overall, the standard development process takes too long and has no clear vision. As a result of continuing uncertainty, interpretation requests increase and resources are diverted from the standards development projects. NERC should re-assess its projects and develop a short list of key high-priority projects that will drive the greatest reliability improvements faster. These select projects should receive detailed attention and priority by NERC staff, the NERC Standards Committee and industry as they move through the standards development process to completion. The key projects should be held to greater scrutiny from a project management view. It should be expected that team members on these teams are held to a higher level of accountability, committed to providing significant time and energy to advance the industry in the key areas that will raise the adequate level of reliability. One example where this has been used is the CIP project. While the NERC website does provide a link to "High-Priority Standards Under Development" the report is merely an outdated version (June 2008) of the complete project summary of all projects that is also available under the link "Standards Under Development Project Status Summary". The key project list should be a limited set of the overall work plan more closely monitored and reported on by NERC. Successfully advancing the ball will require the industry, NERC and the Regional Entities to dedicate the resources - personnel, time and money. Under stressful economic conditions NERC should make conference call and WebEx capability available for staff that may have limited travel budgets and be unable to attend in person meetings.

	Comments and recommendations:
24	PER-005-1 started in December 2004 and is now just pending FERC approval. NERC has changed the numbering of standards without informing the USERS of what their new numbering system means. There is no documentation on the new numbering system of using -1.1 or -0.1a? There are rules to everything we do. NERC needs to publish the "rules" so all entities know what they will be expected to do.
25	Process seems a bit lengthy
26	Q4 NERC: Althought the process needs to be expedited, we realize an open process takes time to result in an effective and comprehensive standard.
27	Some seem to move at an appropriate pace, however; some seem to take years. Need to create an accelerated process for interpretations, the time lag between question and response discourages industry participants from requesting formal interpretations from NERC.
28	SPP is a party to the IRC Standards Review Comments, please refer to that submittal for our response to this question.
29	Standards development on its face would not appear timely. However, given the overwhelming number of standards in the queue since the advent of the ERO, the speed of development and modification of standards has been admirable. The Standards Committee's effort to understand and accommodate regional differences has been a difficult process, but in light of the work load, volume has moved at an acceptable pace. Additionally, the SC's attempts to streamline existing processes (interpretations for example) to improve the timing efficiency of standards will only bring improvements. Consideration should be given to developing a subcommittee of the Standards Committee with a focus on consolidating redundant requirements and prioritizing work in an effort to reduce the average standard development time.
30	The current development and review process appropriately includes a thorough and responsible development and review process that offers the industry the ability to submit comments and standards are accepted through a formal voting process. Unfortunately, many of the original set of NERC Reliability Standards were under revision shortly after issuance. As a result, the industry has attempted to comply with the original standards, while also trying to prepare for the revised versions. The thoughtful and well developed standards and associated language that are being produced as a result of the current process, while not perfect, are a decided improvement over the initial language in the NERC Reliability Standards.
31	The current process does take a long time to develop and modify standards, however the delay may be unavoidable. The drafting teams are made up of subject matter experts, who by their very nature are also in high demand at the organizations they work for.
32	The process is time-consuming, but necessary to get a good standard.
33	The process takes too long. Sometimes Reliability Standards must be modified, but the modification process can take years. Also, there needs to be a period allowing for adjustment to the new Reliability Standards (like was done with CIP-002 through CIP-009). The "Boom! Here it is now comply" mentality is demoralizing and undermines the corporations commitment to compliance.

	Comments and recommendations:
34	The RSDP is slow and cumbersome. That said, the process does produce standards grounded in industry consensus, which is extremely important to the reliablity of the Bulk Electric System. Recognizing the huge tasks of clarifying vague requirements, midstream revisions to address FERC orders, and start-up issues, it is understandable that the RSDP to date has been slow and cumbersome. It is very important that NERC and the Regions, in concert with industy volunteers, continue to improve the cycle time of the RSDP to more quickly address the need for revised and new standards.
35	The stakeholder process does not produce timely results. Moreover, only larger vertically integrated utilities have sufficient staff resources to allow participation in standards development. Smaller registered entities without such resources are effectively precluded from participating on drafting teams, and often do not have resources to adequately review drafts or participate in the commenting and voting processes. Furthermore, smaller registered entities with limited or no staff resources often do not have the capacity to even monitor all reliability standards development activities and determine the applicability of such activities.
36	The standards development process is a good one. These standards are technically difficult and must be carefully considered or there will be negative consequences for the bulk power system and its customers. Getting the standards right is FAR more important than getting them quickly as these standards must operate over relatively long periods of time in order to be effective and efficient.
37	The standards development process is anything but timely. However, if a regulatory body wants input from its industry participants on the types of questions that are routinely asked on the comment forms, it brings into question the wisdom of a swift process.
38	The standards development process is currently organized to produce timely results, however, a timely process may not always mean that all standards can be produced quickly. EEI understands that the Standards Committee is continuously looking for ways to optimize the process. Any modifications to the standards development process must allow NERC to keep its ANSI accreditation. In addition, EEI strongly believes that the industry is committed to acting very quickly in those circumstances where urgent needs are identified for developing a new or revising an existing reliability standard.
39	The standards development process is currently set-up to produce timely results, with that being said that does not mean that all standards can be produced quickly. Although the process needs to be expedited, we realize the open process takes time ian an effective and comprehensive standard. Any modifications to the standards development process must allow NERC to keep its ANSI accreditation.
40	The standards development process is currently set-up to produce timely results, with that being said that does not mean that all standards can be produced quickly. The ANSI process must remain a critical attribute to the standards development process, refinements to the process should be analyzed and and implemented.

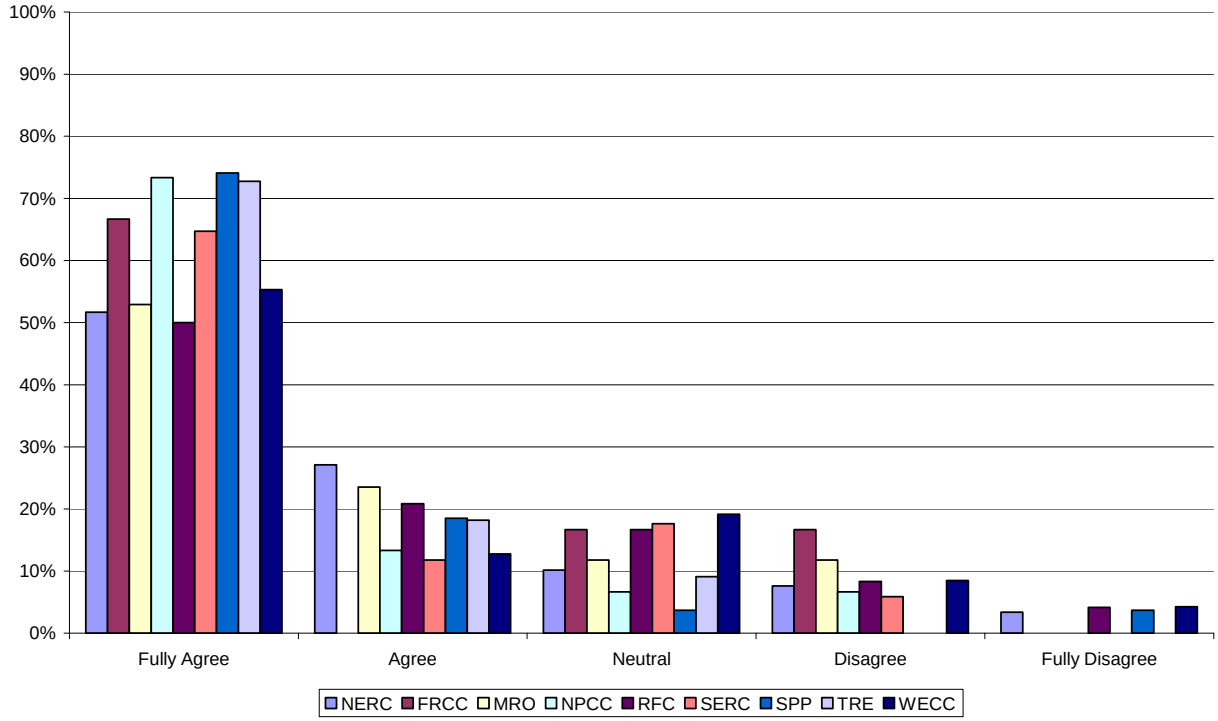
	Comments and recommendations:
41	The standards development process is currently set-up to produce timely results, with that being said that does not mean that all standards can be produced quickly. It's our understanding the Standards Committee is continuously looking for ways to optimize the process. Any modifications to the standards development process must allow NERC to keep its ANSI accreditation. Exelon believes that the outcome of the standard development process should be technically supportable standards that enhance reliability and clearly define compliance objectives.
42	The standards development process is generally time consuming, cumbersome, and it takes too long - but like democracy I find it unlikely that we could craft a superior process that would not have unintended consequences. A number of urgent projects have taken years to complete (ATC, operator training) but that is in many cases a byproduct of the complexity of the project and the need for many conceptual leaps by the SDTs to new paradigms (elimination of fill-in-the-blank approaches to ATC, systematic approach to training/resolution of disputes with FERC over the need for simulation)
43	The standards development process takes too long.
44	there are simply too many standards to timely modify anything. the process should pause while a review is made of all existing standards to try to reduce their number. if that is not possible then, still using an ANSI approach, ways must be found to reduce the time it takes.
45	There is a balance in providing industry input and moving the standards through the process. AEP believes the process is as timely as could be expected, especially when providing ample opportunities for industry input. As standards have been revised, there has been a significant improvement in this regard. With that said, there have been instances where a FERC deadline has rushed the development of the standard and some characteristics have been missed. At times, teams have difficulty managing their time. The team may begin with adequate time, but early topics are exhaustively discussed, but topics toward the end of the process are rushed to meet the time line. Better project management is on the NERC side is needed to avoid this circumstance. SPP's and TRE's standards have been slow to develop to address "fill-in the blank" standards.
46	Though the industry should be cognizant of timelines, standards should not be pushed through for the sake of development of standards. The focus should not be on speed, but rather the quality of the requirements. Except in urgent action situations which require speedy development of standards, timeliness should take a back seat to quality. There is a need for improved project management in standard development, both at the level of individual projects and for the development program as a whole. There is a lack of a well-structured project management process and effective project management capability. Despite the standard development projects being monitored by the standard development managing body, the project milestone dates have neither been established nor adhered to. As a result, remedies or alternative approaches have never been developed to ensure projects are completed on time, or in a reasonable timeframe. The project status (delays) presented at each Standards Committee meeting provides the evidence for the need for better project management and more efficient use of industry resources. NERC should focus on this as a way to ensure standards move through the ANSI process as quickly and efficiently as possible. In addition, there is ineffective management of the full set of development projects. Projects initiated to meet regulatory directives and ad hoc projects initiated by industry participants are added to the list of ongoing projects, resulting in the facilitator and the industry having to take on extra workload. These ad hoc efforts are difficult to plan work resources for and oftentimes, participating organizations either cannot dedicate manpower on the drafting teams or have little time available to make quality reviews during the formative stages of standards development. This has contributed to the result of many if not all standards filed with regulatory authorities being sent back for additional work or changes. As a further indication of ineffective management of the overall development program, the three year standard development work plan is seldom adhered to. Many projects that are planned to start in a particular year have been

	Comments and recommendations:
	deferred to start in the following year. This points to the need for a better planning process to anticipate and accommodate the unplanned projects without over-burdening available resources. It has been three years since the inception of the ERO and experience indicates that the three-year work plans did not anticipate the dynamic nature of standards requests. The three-year work plan should be reviewed and revised to more accurately reflect reliability priorities while respecting the capabilities of the industry. Requests for interpretations, regulatory directives, new requests from industry and a focus on standards that need immediate revision should be considered in development of the plan. Deviations from the three-year work plan are inevitable and unavoidable, but more considerations for the dynamics in the industry will allow participants to better plan and allocate resources for standards development.
47	Too many in the process; stressing limited stakeholder resources. Takes many months if not years to develop or modify. It is recommended that NERC consider assigning a technical writer to each SDT to expedite the drafting process and also consider a "full court" press approach to standard drafting, meaning the teams meet for 3 or 4 full days to hammer out the technical contents of the first draft for the technical writer to put together a first draft for review of the team by the end of the next week. This review would be teleconference. Then post the standard for industry comment. The full court press approach will eliminate rehashing issues that occurs today because the SDT members tend to forget that an issue was resolved two meetings ago. This approach would also fast track standards.
48	Understanding that this is an open stakeholder process and the need for transparancy to the industry, I still believe that the process takes too long and it needs to be modified to make it more efficient and timely.
49	Very slow in development.
50	We recognize that the ANSI approved stakeholder process takes time but this stakeholder process is important to combine the collective knowledge of many entities to develop the requirements needed for reliability.

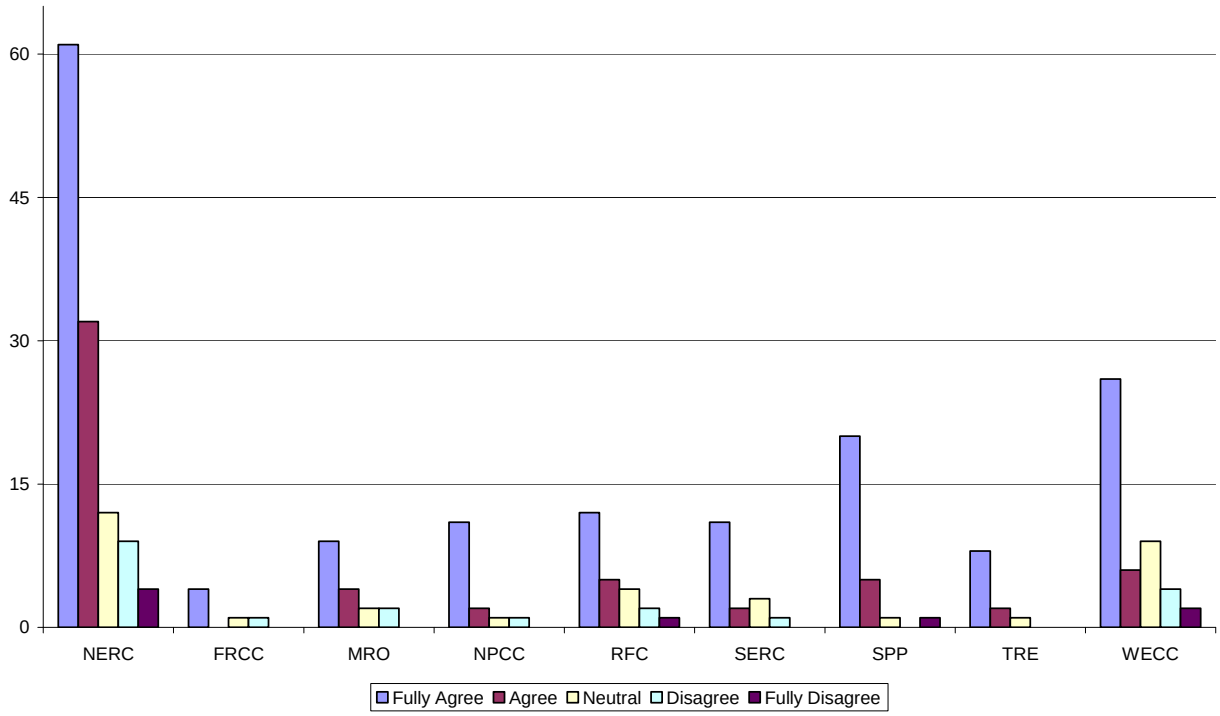
9. Standards development process has been open and inclusive and provides adequate opportunities for interested stakeholders to provide comments.

	NA – Not applicable or have no opinion	1 – Fully agree	2	3 – Neutral	4	5 – Fully Disagree	Response Count
NERC	4.1% (5)	**49.6% (61)**	26.0% (32)	9.8% (12)	7.3% (9)	3.3% (4)	123
FRCC	**86.0% (37)**	9.3% (4)	0.0% (0)	2.3% (1)	2.3% (1)	0.0% (0)	43
MRO	**66.0% (33)**	18.0% (9)	8.0% (4)	4.0% (2)	4.0% (2)	0.0% (0)	50
NPCC	**68.1% (32)**	23.4% (11)	4.3% (2)	2.1% (1)	2.1% (1)	0.0% (0)	47
RFC	**57.1% (32)**	21.4% (12)	8.9% (5)	7.1% (4)	3.6% (2)	1.8% (1)	56
SERC	**66.0% (33)**	22.0% (11)	4.0% (2)	6.0% (3)	2.0% (1)	0.0% (0)	50
SPP	**52.6% (30)**	35.1% (20)	8.8% (5)	1.8% (1)	0.0% (0)	1.8% (1)	57
TRE	**75.0% (33)**	18.2% (8)	4.5% (2)	2.3% (1)	0.0% (0)	0.0% (0)	44
WECC	**39.0% (30)**	33.8% (26)	7.8% (6)	11.7% (9)	5.2% (4)	2.6% (2)	77
						Comments and recommendations:	40
						answered question	**132**
						skipped question	**10**

ERO Survey - Reliability Standards
Question 9



ERO Survey - Reliability Standards
Question 9



	Comments and recommendations:
1	1. Small utilities currently don't have the resources to keep informed on the voting opportunities much less be on a committee.
2	Although stakeholders have an opportunity to comment on and approve reliability standards, EEI is concerned that too much deference is being given to FERC staff. It is this concern that drives our ranking on this question. It is critically important that NERC ensure the integrity of the standards development process as set forth in the FERC-approved process. This process must adhere to the "Essential Principles" identified in NERC's Rules of Procedure (Section 304): Openness, Transparency, Consensus-building, Fair Balance of Interests and Due Process.
3	Although stakeholders have an opportunity to comment on and approve reliability standards, Exelon is concerned that too much deference is being given to FERC staff. It is this concern that drives our ranking on this question. NERC must ensure that the standards development process is followed. This process must adhere to the "Essential Principles" identified in NERC's rules of procedure (Section 304): Openness, Transparency, Consensus-building, Fair Balance of Interests and Due Process. In NPCC, the notification of new standards development efforts is not adequate as there is a need to continuously check the NPCC website for information. Other regions, such as RFC, are more proactive in notifying the stakeholder community as to the formation of new standard development teams
4	APPA's main concern is standards project overload will spread the potential SDT member pool too thinly and exhaust industry capacity to respond during the comment period and make informed judgments proposed ballots. This concern is particularly prevalent among municipal utilities, which generally lack the spare staff resources to commit to SDT membership. Many small municipal utilities do not participate in the standards development process at all. The process is generally very open and inclusive and provides ample opportunities to comment. As noted in NERC's draft preliminary self-assessment, when the Standards Committee has authorized departures from the RSDP to meet a FERC-imposed directive, the industry has generally opposed such departures in comments and in the ballot process. APPA and its members have been very concerned that FERC stff has exercised undue and non-public influence on the standards development process. APPA believes that the new draft SDT Roles and Responsibilities document will clarify NERC expectations for informal input received from FERC staff as well as SDT options to respond to FERC directives. APPA members have generally supported WECC's standards development processes in the past, although there was some dissension over the approval of new operating reserves requirements. WECC's processes also have had the advantage of one-stop shopping, to consider reliability and commercial/business practices impacts at the same time. APPA members have voiced a number of objections to RFC's regional standards projects (see comments above). In part, this may reflect failures to achieve stakeholder segment balance within certain SDTs, as well as the perspectives of SDTs that were in fact formed before certification of NERC and approval of the RFC delegation agreement. However, time and resource constraints prevent most APPA members from actively participating in regional standards development in RFC. APPA has no clear understanding of member views of other regional standards processes.
5	EPSA finds the Standards development process to be open and stakeholders have adequate opportunity to provide comment. As the ERO continues its evolution, EPSA encourage it to establish an outreach effort to those registered entities not traditionally part of the NERC process. While utility entities can be well attuned to the NERC process non-utility entities may need to be familiarized with the ERO and its process.

	Comments and recommendations:
6	I don't know how to remedy, but only the "Big Guys" (e.g. - SOCO, Entergy, TVA, etc.) seem to be writting the Standards because they have the ratepayer dollars to afford committing people just for Standards Drafting. Smaller shops just don't have the resources to committ. Therefore, the well entrenched seem to prevail with their modeling assumptions. Specific: Generator Verification - 50-60 year old generators should not be allowed to be in reliability assessment, transmission access, or long term planning models unless they can prove they have the personnel on hand, air permits, fuel, water, etc. to run. So, true verification testing should be conducted on any generator that will be contained in any model. Yet, the SDTs are exempting those under 5% capacity factor. So, those that don't actually run (less than 5%) are exemted from actually having to prove they have the resources to run at least 24-48 hours (without blowing a gasket).
7	It would be nice if Nerc would provide a forum on their website so entities could communicate with each other on different topics involving Reliability Standards. Entities could log onto the forum & go to the topics or even start a new thread topic to discuss. The forum would provide alot of feedback for Nerc & help other entities that have questions.
8	NERC NERC continues to foster an open, collaborative environment for the standard development process. FPA Section 215 and FERC Order 693 call for it and NERC is providing such open and inclusive participation by all parties to participate. While this is sufficient to meet the statutory requirements of inclusiveness, it is highly problematic when such openness creates influence to standard development that is unfounded from a technical or reliability nature. Again, as stated in Standards Question #3, NERC must take action when the open and inclusive process is excessively driven by parties who are not subject matter experts and when there is a lack of sound engineering, planning, operating or maintenance basis. Without such course correcting during standard development, the standards may include elements that are not providing for or supporting the reliability of the bulk power system. NERC must maintain the technically sound nature of the standards when FERC remands a standard. In exercising their judicatory role FERC may remand a standard directing NERC to modify the standard in order to meet certain legal or enforcement compliance requirements. If FERC directs a technical outcome of a standard, NERC must defer any such requirements to the standards development process in order to properly defer to subject matter experts any such proposed technical outcome. FERC staff who participate on standard drafting teams should not be performing such participation with undue influence that would undermine the development of technically sound standards based on sound engineering, planning and operating principles. Again, NERC should provide training to drafting team chairs in order to effectively manage the standard drafting team activity.
9	NERC The reliability standards development process (RSDP) provides for open and inclusive processes and provides opportunities for interested stakeholders to provide comments. However, there have been recent deviations from the industry stakeholdered standards process and NERC staff and the BOT appear to be willing to abandon the ANSI-approved RSDP. Even though the Standards Committee (SC) authorized these deviations in a public meeting, NERC should refrain from such deviations from the industry stakeholdered and approved processes. On more than one occasion, certain steps in standard development have deviated from established process. Specifically, the withdrawal of a standards authorization request (SAR) was initiated by staff, rather than the SAR requestor/drafting team. In other instances, standards were revised by staff between the initial and recirculating ballots. While these moves may have been directed at improved timeliness, they contravened the established process, sent a confusing and demoralizing signal to the standard drafting teams, and deprived the industry of the opportunity to revise and resubmit the rejected SARs, and to provide comments on the resulting changes. NERC staff should also note that for regional reliability standards, it should only ensure whether a proposed regional reliability standard has been developed in accordance with all applicable procedural requirements and whether the regional entity has considered and resolved stakeholder objections. NERC staff should base its recommendations to the NERC BOT to either accept or reject the regional standard only on the basis of the parameters presented previously. NERC staff should not undermine a regional standard setting stakeholdering process like it did during the NERC BOT approval phase of certain WECC standards. NPCC NPCC standards development processes have been open and inclusive. The development of criteria and regional reliability standards is based primarily on input and comments from stakeholders. NPCC's Reliability Assessment and Performance Analysis program area has standing Task Forces and Working Groups of experts available to supply their expertise in drafting regional standards and reviewing NERC reliability standards. Because of the inclusive nature of its membership, NPCC doesn't have the need to develop separate "ballot pools" for the individual ballots

	Comments and recommendations:
	for Regional standards. NPCC also has had an Open Process for commenting that is online which the ERO has used for a model. In some respects, NPCC processes work better than NERC processes. An area for improvement is in responding to comments. There currently is no formal process, nor has it been the norm, that the lead task force or group that leads the standard development process (may it be A, B and C documents or the Directories or Regional Standards) to respond to comments in a public forum/domain. Commenters often wonder what has been done in response to their comments.
10	NERC and RFC have done a good job in instituting standards development processes that are open and inclusive, and that provide more than adequate opportunities for interested stakeholders to provide comments. Along with the normal comment periods and being members of drafting teams, NERC and RFC do a good job welcoming observers to their meetings and listening to, considering, and taking the comments and insights of observers during the development of the standards. However, to speed the process along NERC and the Regions should have drafting teams simplify responses to comments, eliminate duplication and focus on the most important issues.
11	NERC and RFC-The process is open and inclusive, but the effort to develop a large number of standards simultaneously stymies participation by even some large entities, let alone smaller entities with very limited staff and resources.
12	NERC's standards development process is highly open and inclusive. WECC's process does not appear to be so. Please see my response to question 4 for more on this area.
13	NRECA continues to strongly support NERC's use of the ANSI-approved process for reliability standards development. The continued use of this process is essential to develop industry-based consensus, on both the need for the standard, and the proposed standard itself. An effective industry-based self-regulatory organization requires active, continuing participation and inclusion of industry stakeholders in policy formulation, strategic guidance and standards development. Generally, NERC's procedures support this approach. Unfortunately, it is also true that NERC has, in some instances, overstepped it's authority and own procedures by applying inappropriate pressure on standard drafting teams to require the teams to address FERC directives in specific ways in new or revised standards even in instances when such teams conclude that the technical components of directives do not enhance the reliability of the bulk power system. NRECA continues to believe there is an immediate need for formal guidance, and possibly the development of a memorandum of understanding among the relevant parties, on the roles and responsibilities of NERC staff, FERC staff and standard drafting team members in the standards development process.
14	Q5 NERC: The standards development process must follow the "Essential Principals" outlined in NERC's rules of procedure section 304 -- openess, transparency, consensus-builiding, fair balance of interests, and due process.
15	Regional reliability standards development and balloting processes are slowly becoming more transparent.
16	See comments under Question 1
17	Smaller registered entities do not have sufficient staffing resources to participate in most standards development activities and are therefore either precluded or seriously disadvantaged in their level of participation. NERC and WECC must find a way to subsidize the input of smaller registered entities to mitigate this disadvantage and gain further input from such entities.
18	Sometimes the process is too fast for adequate commenting.

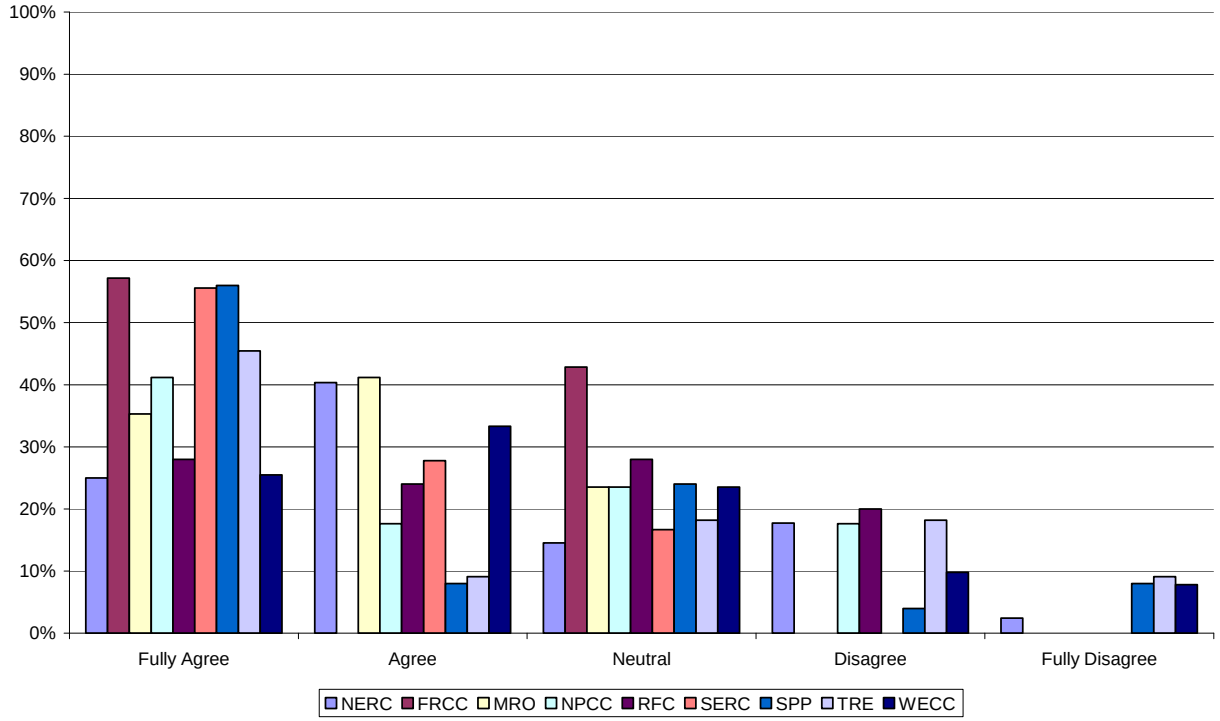
	Comments and recommendations:
19	SPP is a party to the IRC Standards Review Comments, please refer to that submittal for our response to this question.
20	Stakeholders to have the ability to provide comments and ballot on standards. NERC must continue to ensure that the standards development process adheres to the "Essential Principles" identified in Section 304 of the Rules of Procedure. Openness, Transparency, Consensus-building, Fair Balance of Interests and Due Process.
21	Standards drafting teams are open to all; however, standards and policies that are reliability-related should have a chair and majority of members from reliability organizations, not merchant.
22	The current process is not open and does not include adequate opportunities for interested stakeholders for several reasons. First, the location in the eastern part of the U.S. places a severe restriction on west coast participants. The additional travel requirements for west coast team members is a huge cost and resource burden. Drafting team meetings could easily be held in a more central location to try to obtain more balanced representation from industry across the U.S. In addition, in our experience, the nomination of experienced team members for drafting team vacancies, with technical expertise and interest, have not been successful in large part. The process for selection is not clear and does not afford all regions and entities within those regions an equal opportunity for participation. This issue is compounded for entities that are experiencing a loss of qualified and experienced personnel being recruited by the RROs because the industry is competing for the same technical experts. Recruitment of technical experts away from the registered entities trying to comply is detrimental to the registered entities.. This need is evidenced by the statement on page 7 of WECC's annual report which states that "…if the volunteer pool begins to dry up, …., WECC will propose additional positions in the department.
23	The design of the process is open and inclusive. However, there is a perception of potential undue influence on SDT's by NERC and FERC staff which is disturbing. NERC and FERC should endeavor to ensure that staff participation in the standards development is appropriate and does not cause the ANSI process to be perceived as being just for show.
24	The NERC standard development process is well documented and followed. However FERC places demands on schedules and even approvals that conflict with the standards development process. This puts NERC, the RROs, and the electric industry participants in a difficult position. Because the standards are balloted in an open ANSI approved process it is clear that not all standards will pass or meet the needs of the electric industry. It is clear FERC wants to dictate specific standard language as well as schedules for the NERC standards.
25	The NERC's ANSI – accredited standards development process as defined in the Reliability Standards Development Procedure process seems to be productive within the stakeholder process
26	The process allows for open and inclusive participation, and for interested parties to provide comments. NERC should diligently follow the ANSI approved process they have established, continuing to ensure that all steps in the process are followed. NERC should also follow the accept/reject processes established for regional standards when such regional standards have been forwarded to them.
27	The process for the requirements has been open, inclusive, and provides adequate opportunities for interested stakeholders to provide comments. The process for the Violation Risk Factors, Measures, and Violation Severity levels are moving away from as rigorous an opportunity for stakeholder input, however this may be a necessary step to insure expedient production and modification of standards.
28	The process has been open and inclusive so far. NERC should ensure that ,moving forward, this open and inclusive process which includes adequate opportunities for the stakeholders participation is maintained. It is the only way to develop a technically sound standard to enhance reliability.

	Comments and recommendations:
29	The process is admirable but adminstration is sometimes lacking. For examole, comments that have been submitted have been somehow mis-interpretted when posted. Additionally, there are still "sub-regional" differences even within a region. Applicability is not universal within RFC for example, where a minimum of 3 RTO/ISOs exist and operate differently.
30	The process may be too open, thus long delay in implement change
31	The process seems good but Tacoma Power does not have enough people with the necessary knowledge and time to respond to the constant changes in standards.
32	The processes are open to participation. However, too much weight is given to the regulator rather than to those industry experts responsible for reliable operation of the Bulk Power System.
33	The reliability standards development process (RSDP) provides for open and inclusive processes and provides opportunities for interested stakeholders to provide comments. However, there have been recent deviations while from the standards process and NERC staff and the BOT appear to be willing to abandon the ANSI-approved RSDP. Even though the Standards Committee (SC) authorized these deviations in a public meeting, NERC should refrain from such deviations from the industry stakeholdered and approved processes. On more than one occasion, certain steps in standard development have deviated from established process. Specifically, the withdrawal of a standards authorization request (SAR) was initiated by staff, rather than the SAR requestor/drafting team. In other instances, standards were revised by staff between the initial and recirculating ballots. While these moves may have been directed at improved timeliness, they contravened the established process, sent a confusing and demoralizing signal to the standard drafting teams, and deprived the industry of the opportunity to revise and resubmit the rejected SARs, and to provide comments on the resulting changes. NERC staff should also note that for regional reliability standards, it should only ensure whether a proposed regional reliability standard has been developed in accordance with all applicable procedural requirements and whether the regional entity has considered and resolved stakeholder objections. NERC staff should base its recommendations to the NERC BOT to either accept or reject the regional standard only on the basis of the parameters presented previously. NERC staff should not undermine a regional standard setting stakeholdering process like it did during the NERC BOT approval phase of certain WECC standards.
34	The standards development process provides opportunities for industry to comment on proposed standards or modifications to standards. Unfortunately, comments that do not support regulatory directives do not appear to receive adequate consideration. Regulatory participation in the development process may discourage interested stakeholders from submitting comments given perceived indifference to industry concerns.
35	The WECC standard that was recently submitted to FERC for approval was not balloted nationally, even though it introduced new definitions into the NERC glossary. Stakeholders can provide comments but they are frequently not addressed.
36	There are so many standards under review, balloting, voting, re-balloting, ect, that companies are making positions just to review standards. The industry is being overwhelmed. NERC's three year plan is very aggressive. I see that there is a new trend to have a web cast of several proposed standards. I hope this will reduce the amount of comment periods. But, the electrical industry needs to weigh in on the process to ensure that standards meet the needs of a reliable BES.
37	There has been some difficulty with adequate posting of SERC reliability standards-related initiatives. However, SERC staff have been responsive, and the issue was resolved with understanding of the SERC standing committee membership process.
38	There is some concern with the deference given to FERC Staff. FERC Staff opinion and input should be on the same playing field as other stakeholders.
39	We believe that the use of the stakeholder process should be consistently applied. At times, NERC has deviated from the process, which has limited the opportunity for stakeholder comment and input.
40	We do not support the VRF determination being left up to NERC staff.

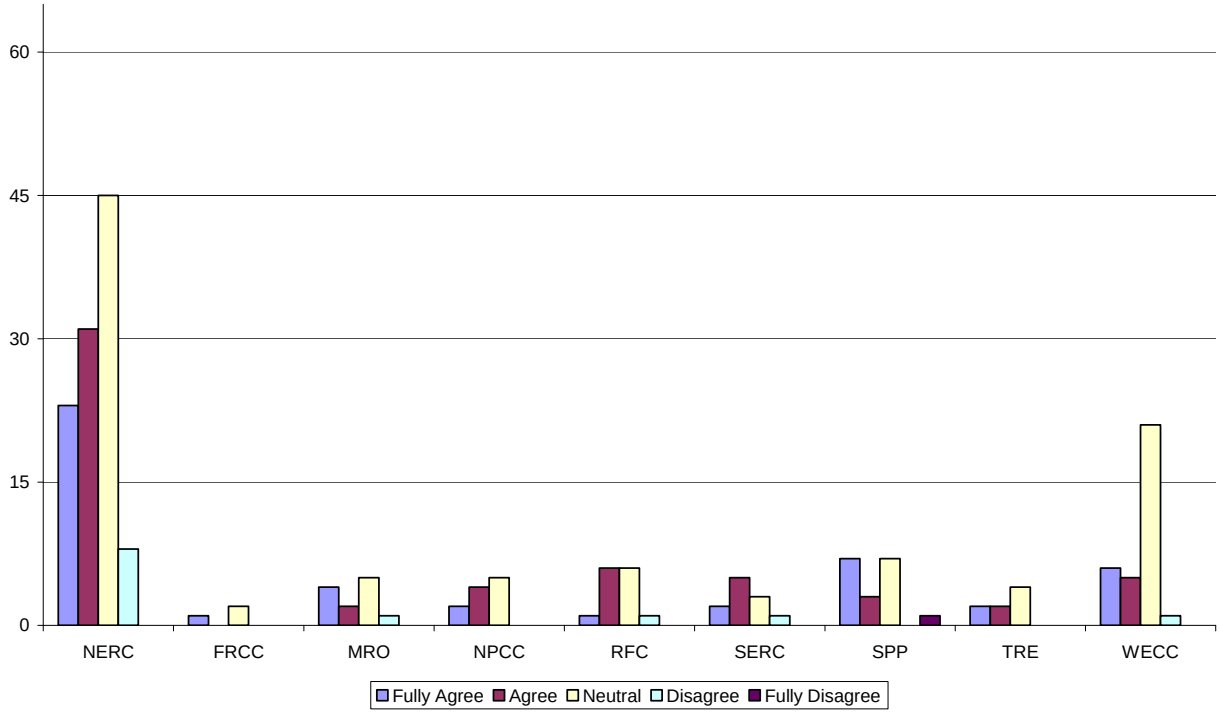
10. NERC's three-year reliability standards work plans have provided appropriate statements of the work scope and priorities necessary to develop new reliability standards and modifications to standards that are most needed.

	NA – Not applicable or have no opinion	1 – Fully agree	2	3 – Neutral	4	5 – Fully Disagree	Response Count
NERC	12.3% (15)	18.9% (23)	25.4% (31)	**36.9% (45)**	6.6% (8)	0.0% (0)	122
FRCC	**93.2% (41)**	2.3% (1)	0.0% (0)	4.5% (2)	0.0% (0)	0.0% (0)	44
MRO	**76.0% (38)**	8.0% (4)	4.0% (2)	10.0% (5)	2.0% (1)	0.0% (0)	50
NPCC	**76.6% (36)**	4.3% (2)	8.5% (4)	10.6% (5)	0.0% (0)	0.0% (0)	47
RFC	**73.6% (39)**	1.9% (1)	11.3% (6)	11.3% (6)	1.9% (1)	0.0% (0)	53
SERC	**78.0% (39)**	4.0% (2)	10.0% (5)	6.0% (3)	2.0% (1)	0.0% (0)	50
SPP	**67.9% (38)**	12.5% (7)	5.4% (3)	12.5% (7)	0.0% (0)	1.8% (1)	56
TRE	**82.2% (37)**	4.4% (2)	4.4% (2)	8.9% (4)	0.0% (0)	0.0% (0)	45
WECC	**54.8% (40)**	8.2% (6)	6.8% (5)	28.8% (21)	1.4% (1)	0.0% (0)	73
					Comments and recommendations:		29
						answered question	**131**
						skipped question	**11**

ERO Survey - Reliability Standards
Question 10



ERO Survey - Reliability Standards
Question 10



	Comments and recommendations:
1	1. The work plans change, projects get added or deleted as knowledge is gained.
2	AS A SMALL UTILITY IT HAS BEEN OVERWELMING PUTTING ALL DATA TOGETHER AND LEARNING THE COORECT/ACCETABLE DOCUMENTS TO BE IN COMPLAINCE. THERE SHOULD BEEN MORE OF START UP PERIOD FOR TRAINING AND FULL ENFORCEMENT WITH FINES Just needed more semairs. we all are learnig as we go includinG NERC AND RFC STAFF.
3	Continued support of the open ANSI process of stakeholder development of the standards is key to the long term success of improving the reliability of the bulk power system.
4	From comments in question five, the priorities appear to be driven more by FERC than electric industry requirements.
5	IMEA is not able to adequately comment due to limited resources available to monitor such plans. IMEA supports comments submitted by the Transmission Access Policy Study Group (TAPS) and the American Public Power Association (APPA).
6	In general the three-year work plan provides appropriate work scope but we are not sure about NERC's process to assign priorities in all cases. For example, (1) How does NERC resolve a difference in priority perspective between industry and FERC? (2) How are SARs anticipated and included in the 3-year plan or are they included as they come up? Also, too may projects are pursued concurrently for us to keep with them to review and provide input.
7	NERC NERC has developed excellent 3-year work plans outlining the standards work necessary for the current and future needs. These plans continue to change and are challenging due to the time required to properly develop sound standards. NERC should continue to be allowed the necessary standard development time in order to meet the emerging standards development work. NERC should continue to pursue prioritization of standards in the order of impact and risk to the bulk power system.
8	NERC has done a good job of documenting their work plans. While the reports are large, they are well organized and provide a lot of information on upcoming projects. However, the scope of these projects, and the industry, would benefit from a more thorough scope description. This would allow entities to more fully appreciate the impacts of each project on their specific interests and prioritize staffing needs to respond to drafting team requests.
9	NERC needs a more systematic process for prioritizing the existing standard projects and future standard projects based on risk to the bulk power system. NERC currently has 33 projects listed on its standards development page and deals with approximately three to five interpretations request a month. The level of quality review and feedback could be hindered by the lack of prioritization and planning. In addition NERC currently list 15 projects that have been filed with FERC but are awaiting approval and 11 projects that have yet to be filed with FERC. Combined that is 58 projects that NERC and the industry are managing and tracking. The NERC three year plan lacks clarity with regards to the ultimate deliverable. The overall desired outcome of three-year initiative is not sufficiently defined.

	Comments and recommendations:
10	NERC should improve its standards development work plan and process in regards to the treatment of FERC directives to modify standards. NERC should encourage a strong self-regulatory organization and allow drafting teams the opportunity to provide technically equivalent alternatives to the FERC directives. Instead NERC and FERC staff discourage drafting teams from offering equivalent alternatives. NERC staff needs to reconsider its position in this area and provide the drafting teams the latitude to develop, document and offer viable alternatives. NERC's three-year reliability standards work plan needs to focus more on modifying key reliability standards and less on administrative requirements. The standards should be overhauled to remove administrative and documentation items that do not provide significant reliability improvements. NERC's standards development plan should focus on developing requirements and not be distracted by other aspects, such as Violation Severity Levels (VSL) and the Penalty Matrix. The development of VSL has taken much time from industry resources in the development of standards. Also, the inclusion of VSLs in reliability standards may unduly affect the acceptability and ultimate approval of a standard. Industry focus should be on the requirements and measures of a standard and the VSL should be removed and dealt with from a compliance enforcement standpoint. The recent actions taken by the Governance Committee in this regard is a step in the right direction but may not go far enough. NERC should improve its communications of BoT approval of standards, NERC petitions to FERC for approval of standards, and FERC Orders regarding disposition of standards. NERC should provide standard drafting teams with more guidance and training on how to lead and participate on a drafting team. NERC should offer technical writing assistance to teams.
11	NERC three-year plan is far too aggressive and places unreasonable demands on entities to participate in the process. NERC is trying to do too much. While we understand that NERC must continue its development activities, there is also a great need to review the way standards are written to increase clarity of intent and expectation. Developing a small number of quality standards is far better than developing a large number of ambiguous standards. There should also be a strong focus on the standards with high risk to reliability. Churning out more standards when underlying structural problems exist only serves to perpetuate problems within the standards.
12	Not sure how all this is going to be accomplished in three years. Very aggressive. NERC took policies and turned them into Standards. Everything is a priority. VRFs and VSLs only relate to the penelity if the entity is found to be non compliant. But they are still non complianct.
13	Prioritization of the work plans have been developed well, but at times important standards can get bogged down in testing or other issues that has resulted in a delay of some standards.
14	Probably more than 90% of the reliability benefits are found in less than 10% of the standards. NERC needs to simplify the program and downsize the number of standards and requirements. NERC has created a bureaucratic nightmare which forces so much attention to details that the "big picture" is often lost.
15	SPP is a party to the IRC Standards Review Comments, please refer to that submittal for our response to this question.
16	The imposing volume of paper makes the 3-year plan less useful than it could be for small entities. A higher level document 1/3rd the length would be more easily used (read) by smaller entities. It seems as if the standards keep changing and the utilities are struggling to keep up.
17	The opportunity to comment has been there, but industry participation and comments have been disappointing. In general, APPA is quite pleased with the quality of work and effort of the NERC standards staff. Improved communications and industry consensus building will be needed in the future to make the reliability standards work plans more effective tools to guide NERC/industry resource commitments.
18	The plan needs to demonstrate how future projects are prioritize based on risk and available resources. In addition, the plan should show how the existing workload schedule impacts the future projects.

	Comments and recommendations:
19	The plan needs to demonstrate how future projects are prioritized based on risk and available resources. In addition, the plan should show how the existing workload schedule impacts the future projects.
20	The priorities seem to be correct; however the statement of work scope can at times be too flexible.
21	The process is delayed and vague. Vested Stakeholders have learned "the system" and use the access to their benefit. Smaller utilities can't afford to fly someone - much less a technical expert that is essential to system operations - to a monthly meeting.
22	The standards must be based upon good technical measures related to reliable operation of the Bulk Power System.
23	The standards work plan is very lengthy with a 56 page Overview and a 236 page List of Projects. There are 39 projects in the 2009-2011 work plan, with many projects containing more than one standard. The sheer volume of these documents in combination with the large number of NERC and RE SDT meetings and standard drafts is overwhelming to smaller entities with limited staff. Please see answer to question four in this section for further comments on this question.
24	The work plan needs to more clearly demonstrate how future projects are prioritized based on needs to support bulk power system reliability, and available resources. In addition, the work plan should show how the existing workload schedule affects future projects.
25	The work plans are comprehensive but the sheer volume makes it unliekely that they will produce the desired outcome. The work plan should limit itself to reasonable expectations. Human beings need to carry out work plans.
26	There is a need for a moratorium imposed upon regions so that they can't just 'draft their own' standards because they don't agree with the NERC schedule. This is especially true of RFC. As an example RFC has spent the better part of the last year working on standards related to Disturbance Monitoring, generator verification testing and under-frequency relaying. • This past week NERC issued a draft standard PRC-002-2 to establish requirements for installation of Disturbance Monitoring Equipment (DME) Project 2007-11. • NERC's Generator Verification Project 2007-09 appeared to be inactive (no activity since July 2007) until this week when they issued two proposed standards (MOD-026-1 and PRC-024-1) for comments (due April 2nd). There is also a need to be some restraint on the development of SARs and realignment of existing standards. As examples Dominion's comments to Real-time Operations (Project 2007-03) read: While we agree with the SDT that all prerequisites must occur prior to implementation of this plan, we wish to cite, for the record, the sheer volume of draft standards that are now 'dependant' for prerequisite action on preceding drafts. We would like to see a moratorium on new drafts until the current back log is cleared. We are concerned that new drafts are being reviewed with the potential that ramifications of underlying/preceding drafts aren't being fully understood and/or that modifications made to any such drafts may not follow through in later draft standards predicated upon them. We believe that the existing standards are clearer than those contained in this draft. This draft seems to be trying to delineate TOP and BA standards/requirements from RC standards/requirements. In doing so, the draft loses the feeling of cohesiveness of the existing standards. Generic comment - There appears to be a hierarchy created by Reliability Standards with the RC being highest, followed by (equally?) the BA and TOP. If this is true, we'd prefer that the RC identify requirements necessary to enable it to meet its requirements under the standards. As new standards are being created, there appears to be the potential for some entities to have to provide the same information or have to coordinate actions with multiple entities but at different times, using different protocols. As an example: IRO-002-2 already requires the RC "to determine the data requirements to support its reliability coordination tasks and shall request such data from its Transmission Operators, Balancing Authorities, Transmission Owners, Generation Owners, Generation Operators, and Load-Serving Entities, or adjacent Reliability Coordinators." EOP-002-2 states "A Balancing Authority anticipating an operating capacity or energy emergency shall perform all actions necessary including bringing on all available generation, postponing equipment maintenance, scheduling interchange purchases in advance, and being prepared to reduce firm load." In order to meet this requirement, the BA will likely have to request GO/GOP to provided unit availability data (outages, derates) and the DP, TOP and/or LSE to provide load projections. This same information will likely be needed (and required) by the RC to perform its assessments. In this project TOP-001-008@ R4 states "Each Transmission Operator and Generator Operator shall coordinate its respective operations known or expected to affect other reliability entities." and TOP-003-1@ R4 requires entities to provide data, as specified in Requirement R1, to its Transmission Operator(s). If these entities have provided the information required by their respective RC and the RC is required to coordinate with other RCs (IRO-014-1) there appears to be duplication which increases the workload of each

	Comments and recommendations:
	entity and introduces opportunity for miscommunication or what may appear to conflicting submission of data (assuming that format and timeline differ). Specific comments TOP-001-2 R3 - concern about ambiguity of phrase "to others", particularly from the GOP perspective. For reliability standards, the GOP should only be required to provide such assistance when so requested by its RC. Any other obligations should be included in the terms and conditions of its Interconnection Agreement with the TO or DP and, as such, is outside the scope of these standards. R4 - Concern about phrase "coordinate its respective operations known or expected to affect other reliability entities with those entities", particularly as it applies to GOP. GOP doesn't have access to data, nor the expertise, to make reliability assessments and may be precluded by Codes/Standards from coordinating with other entities. Suggest revising to require GOP to provide data as required by its RC to perform reliability assessments. Since GOP has to follow emergency directives issued by RC or TOP, there is nothing for the GOP to coordinate. If GOP actions or planned actions are deemed to have the potential to result in adverse impact to reliability, the RC or TOP should issue a directive to GOP to cancel such actions. TOP-002-3 - R3 should be deleted given that IRO-004@R3 states that "Each RC shall, in conjunction with its Transmission Operators and Balancing Authorities, develop action plans that may be required, including reconfiguration of the transmission system, re-dispatching of generation, reduction or curtailment of Interchange Transactions, or reducing load to return transmission loading to within acceptable SOLs or IROLs." TOP-003 R1.2 - Am concerned about the term "mutually agreeable format". Does the phrase 'mutually agreeable' apply to ALL applicable entities, or just the TOP and BA? Aren't there enough protocols and tools currently in existence (SDX, ICCP, RCIS) that the standard could at least address use of existing formats as opposed to 'mutually agreeable'? R4 - Does not require entities to provide data to BA although R1 requires BA to "…have a documented specification for data….." and R3 requires each BA to "distribute its data specification to entities…". We suggest revising R4 to read "Each Balancing Authority, Generator Owner, Generator Operator, Interchange Authority, Load-Serving Entity, and Transmission Owner shall provide data, as specified in Requirement R1, to its Transmission Operator and Balancing Authority." We removed the plural indicator as we believe that each entity's facility can be in only one TOP and BA area. If information relative to that facility is needed by multiple TOPs or BAs, those entities should share information. The entity should not be required to submit data for the same facility to multiple reliability entities.
27	This is where NERC needs to revise its strategy. NERC should produce 3 year plans which take into consideration (a) priorities for the future (b) mitigation plans in the event that such high priority projects are not completed in time, and (c) sufficient time buffer for regulatory interventions in to the standards process. The NERC planning process and the standards associated with the plans seem to get derailed every time FERC issues orders which require NERC to revise certain standards leading to a lack of confidence in NERC's ability to deliver the standards that they have committed to. There should effort put into cleaning up and simplifying the standards. The goal right now seems to be to churn out as many requirements as possible.
28	This is where NERC needs to revise its strategy. NERC should produce realistic 3 year plans which take into consideration (a) priorities for the future (b) mitigation plans in the event that such high priority projects are not completed in time, and (c) sufficient time buffer for regulatory interventions in to the standards process. The NERC planning process and the standards associated with the plans seem to get derailed every time FERC issues orders which require NERC to revise certain standards leading to a lack of confidence in NERC's ability to deliver the standards that they have committed to.
29	Yes the work plans seem appropriate. However, given the volume of standards currently under development, perhaps the plans for new work need a system of prioritization that can identify which standards will be assigned a reduced priority if additional high priority items are identified.

11. Comments and recommendations for improvement (specifically number recommendations, i.e. Recommendation 1):	
	Response Count
	51
answered question	51
skipped question	91

	Comments and recommendations for improvement (specifically number recommendations, i.e. Recommendation 1):
1	(1) Maintain the consistent use of the stakeholder process, including for review of VSLs and VRFs. Refer to question #2 in this section of the survey. (2) Address LSE applicability.
2	1) Start and finish SOON a process to provide detail and clarity to the definition of facilities covered by the agreement. 2) Start looking at the Standards that include TOP as one of the applicable entities. Give consideration as to whether a small transmission owner that is not a balancing authority can really perform the tasks.
3	1) Provide for recognition of Entities operating inside an ISO/RTO that perform significant percentages of the requirements for it is they who control and operate the BES 2) Provide for recognition of Entities that are transmission dependant where upstream TO's have operational and protection responsibility and who control the BES
4	1) Reduce the number of standards to remove the overlap and add clearity. 2) Include Regional Entity guidelines in the normal standards development process if they are going to be treated as standards as appears to be the case.
5	1) Some standards, ie FAC-008 in the case of generating facilities, appear almost non-sensical. 2) A definition of explication of what constitutes adequate documentation of compliance is necessary.
6	1) Train your folks and the compliance folks in the regions (e.g., WECC) on the difference between legally mandatory and desired. We are in the WECC region and WECC has a tendency to confuse the two during industry workshops (CUG) and phone calls (Open Mics). On more than one occassion, WECC has stated that certain activities not described in any FERC approved standard are "mandatory" when in reality they are nothing more than what WECC desires. It appears to be an abuse of power.
7	1. Have the standards meet the industry terminology.
8	1. Need to create an accelerated process for interpretations, the time lag between question and response discourages industry participants from requesting formal interpretations from NERC.
9	1. Please see previous comments and recommendations. 2. Large entities appear to have an undue influence in the voting process for proposed reliability standards. 3. IMEA is currently tracking over 40 proposed reliability standards initiatives impacting one or more of our registered functions. This is significantly impacting our reliability compliance resources. A moratorium needs to be declared on all but the most critical standards deveopments needed for the protection of the reliability of the BPS.
10	1. Reduce the amount of standards. 2. Some standards should be backed up by fines due to there importance others should be good utility practices.
11	1. Speed up the comment period, by either reducing the times a particular stnadard is out for comment, or the amount of days that it must be posted. There is no reason for a standard, like the PER-005-1, to take over 3 years to get approved.
12	1. The number of projects that can be tackled depends on the complexity of the project. NERC need to undertake a "resource budgeting" exercise and anticipate availability of industry expertise to participate on Standard Drafting Teams. Entities can't keep up with the volume of work that NERC is attempting to complete. 2. Quality not quantity. NERC needs to improve the way standards are written to increase clarity and understanding. The number of Requests For Interpretation reflect the marginal quality of the product. 3. NERC lawyers need to review every standard to ensure that they can withstand legal scrutiny.
13	1. Greater alignment is needed between the Functional model document and NERC's registration criteria. 2. NERC must actively review all FERC Orders and NOPRs to ensure that any applied interpretation is based on the sound engineering and operation practices.

	Comments and recommendations for improvement (specifically number recommendations, i.e. Recommendation 1):
14	1. Greater alignment is needed between the Functional Model Document, NERC's Registration Criteria and reliability standards. The goal of that alignment should ensure that appropriate registration criteria is being applied and that reliability standards reflect the registration. 2. Remove the low risk (Bulk Power System) administrative requirements from standards. 3. Greater prioritization of work based on risk to the Bulk Power System 4. Review and refine the expected outcome of the three-year work plan. 5. Greater consistency among the standards drafting team (Quality of the requirements and measure)
15	1. Link RSAWs and Standards together. Why are they separate?
16	1. Reduce the number of requirements or at least don't add any more. 2. Concentrate on the basics that directly influence reliability across regions. Individual utilities are already doing everything they can to keep the lights on for their customers. The goal should be to prevent large scale problems like cascading outages.
17	1. The GO/GOP and the TO/TOP registrations issues need to be resolved.
18	1. There needs to be a better alignment between the functional model, registration and the standards. 2. The role of the RTO/ISO must be recognized in the standards. The standards need to reflect the changing world of the RTO/ISO.
19	1. Recommendation 1 - There should be a dedicated effort to clean up the standards and remove explanatory text labeled as requirements or sub-requirements. NERC staff should initiate SARs to address this issue as soon as possible. This will also help expedite the development of appropriate VRFs and VSLs. 2. Recommendation 2- In its work plans, NERC should also provide sufficient buffer for unanticipated regulatory rulings and mitigation plans should be developed in the event certain high priority standards do not get completed according to the work plans. 3. Recommendation 3 - NERC should solicit industry input regarding development of priority issues.
20	1.) Better process for assigning responsibilities for requirements and measures of standards for mixed ownership on single segments withing regions.
21	1: Define a Transmission Protection System. 2: Get the regional reliability entities in line with the national standards.
22	1: Develop a decision making process for responding to FERC orders on reliability standards. This process must be developed in an open effort with stakeholder input. 2: The GO/GOP, TO/TOP, LSE registrations issues needs to be resolved. 3: Greater alignment is needed between the Functional Model Document, NERC's Registration Criteria and reliability standards. The goal of that alignment should ensure that appropriate registration criteria is being applied and that reliability standards reflect the registration. Where the fit is not good with the functional model, NERC should consideration registration by Requirement.
23	a. NERC should continue to present the Functional Model in regular standards and compliance forums so that industry participants are continuously updated, aware of and understand the interrelationships between the functions. NERC should make access to the Functional Model document more accessible - currently it is not an easily discovered document on the NERC Website. NERC should continue to solicit industry input to the Functional Model Working Group revisions process – thereby including those best suited to understand the functions and relationships within and between entities that are responsible for the bulk power system functions. b. NERC must provide process and scope training for drafting teams such that the performance measures and the standards requirements resulting from the drafting team's work are in line with and supporting the overall scope of reliability for the bulk power system. c. NERC should continue to pursue and design the level of reliability for the bulk power system that relates back and coordinates with each developed standard. The intrinsic level of reliability for the bulk power system, for which each requirement of each standard should support, remains an indeterminate. d. The NERC standards development process must be preserved in order to continue to ensure that the standards provide technically sound and effective requirements that support bulk power system reliability. e. NERC must take action when the open and inclusive process is excessively driven by parties who are not subject matter experts and when there is a lack of sound engineering, planning, operating, or maintenance basis. Without such course correcting during standard development, the standards will contain elements that are not providing for or supporting the reliability of the bulk power system. f. NERC may consider a formal process for evaluating directives from FERC for standard development. Also, NERC must respond in an appropriately technical manner when addressing FERC directives that include specific technical outcomes for standards. g. NERC must also be allowed to continue with an ANSI accredited standards development process. h. NERC should continue to pursue prioritization of standards in the order of impact and risk to the bulk power system.
24	Ask this question for each standard, "Is this standard really needed for reliaiblity?" Or, rank the standards in order of their importance and eliminate the bottom 80%. Entities, especially smaller entities are overwhelmed by the sheer volume of standards and requirements.
25	CIP 002-009 ARE TOO SUBJECTIVE

	Comments and recommendations for improvement (specifically number recommendations, i.e. Recommendation 1):
26	EEI believes that NERC must ensure the standards development process focuses on technically sound standards built upon active stakeholder participation. In addition, EEI makes several additional specific recommendations: 1: Ensure that NERC's policy covering interaction with FERC staff during the standards development process is followed and disseminated to NERC staff and all standards drafting teams. 2: The "rights and responsibilities" policy document must be completed. 3: Develop a decision making process for responding to FERC orders on reliability standards. This process must be developed in an open effort with stakeholder input. 4: The GO/GOP and TO/TOP registrations issues needs to be resolved. 5: Greater alignment is needed between the Functional Model Document, NERC's Registration Criteria and reliability standards. The goal of that alignment should ensure that appropriate registration criteria is being applied and that reliability standards reflect the registration. 6: In light of the other responses to questions in this section, NERC stakeholders should strongly consider a comprehensive review of the body of reliability standards to ensure that there are no gaps or overlaps, reliability standards ensure bulk power system reliability, and the need to clarify requirements in existing standards.
27	Ensure all standards and requirements meet the regulatory definition of a standard as defined in 215. Eliminate all standards and/or requirements that do not meet this definition or have a low impact on bulk electric system reliability and retain them as guidelines.
28	Ensure that the standards development process focuses on technically sound standards built upon active stakeholder participation. 1: Ensure that NERC's policy covering interaction with FERC staff (during the standards development process) is followed and disseminated to NERC staff and all standards drafting teams. 2: The "rights and responsibilities" policy document must be approved. 3: Develop a decision making process for responding to FERC orders on reliability standards. This process must be developed in an open effort with stakeholder input. 4: The GO/GOP and TO/TOP registration issues needs to be resolved. 5: Greater alignment is needed between the Functional Model Document, NERC's Registration Criteria and reliability standards. The goal of that alignment should ensure that appropriate registration criteria is being applied and that reliability standards reflect the registration.
29	N/A
30	NERC should conduct a survey similar to this one, but allow the responders to remain anonymous. It is very likely that NERC would receive different answers in such a survey.
31	NERC should continue to leverage industry expertise to create and revise standards that are technically defendable, and use the process that is intended to be open to all interested stakeholders, and mindful of the expection that standards can be adopted in non-US jurisdictions in North America.
32	None
33	None
34	None
35	Please see the written comments submitted by APPA on February 25, 2009.
36	Q7 NERC: Coordination among the Functional Model, Registration Criteria, and reliability standards will ensure that the appropriate registration criteria is applied and that the reliability standards reflect the registration.
37	Recommendation 1 - There should be a dedicated effort to clean up the standards and remove explanatory text labeled as requirements or sub-requirements. NERC staff should initiate SARs to address this issue as soon as possible. This will also help expedite the development of appropriate VRFs and VSLs. Recommendation 2 - NERC should identify in its plan a breakdown of standards work and expenditures due to; a) industry driven standards and b) Regulatory driven standards and rework. Recommendation 3- In its work plans, NERC should also provide sufficient buffer for unanticipated regulatory rulings and mitigation plans should be developed in the event certain high priority standards do not get completed according to the work plans.
38	Recommendation 1- this is a very complicated and technically intensive process that requires the appropriate timeframe to get it right. It is more important to get it right than to get it fast.
39	Recommendation 1) NERC should focus on getting its key reliability standards improved quickly. Moreover, NERC needs to distinguish the standards important directly to reliability of the bulk power system versus standards that are administrative in nature. The standards development process should be overhauled to accomplish this, such that administrative, documentation-type standards that are beneficial, but in and of themselves do not involve an immediate risk to reliability, can be developed differently than key reliability standards.

	Comments and recommendations for improvement (specifically number recommendations, i.e. Recommendation 1):
40	Recommendation 1): The registration criteria must be updated to address reliability issues rather than Level of Service (“LOS”) issues. See response to question 3 Recommendation 2): Violation Risk Factors (“VRF”) and Violation Severity Levels (“VSL”) must be used in the context of the actual registered entities size and impact rather than the specific standards. There is a big distinction between how 30 MW electric utilities versus a 3,000 MW electric utilities can impact neighboring system. Recommendation 3): The sensationalism about cyber exposures to the electric system should be reviewed and vetted by electric system experts not information system consultants looking to increase there billable hours. The cyber exposure should be reviewed in context with other risks to the electric system. If you would like more information on these risks please contact me at 425-783-8080.
41	Recommendation 1): write in a manner the operators of the BES (Customers) can understand clearly, precisely, and quickly. Recommendation 2): Don't expect the Customers to be able to read the minds of the writers. Recommendation 3): Get the SDT leads to recognize and consider comments from IPPs and merchants who are more interested in ratepayers getting the most economic (& reliable) wholesale power instead of just maintaining their old entrenched ways (especially in the East).
42	Recommendation 1: NERC's and SERC's work plans do provide a work scope and priorities. The problem is that there is no summarized documentation showing eactly which new standards and revisions to existing standards have been approved by FERC and are hence enforceable. The need for this summarized document is most needed by small entities that have limited staff which are trying to keep the lights on and also are trying to comply with regulatory requirements. This document is of less important for larger entities that have dedicated regulatory compliance staff.
43	Recommendation 1: Simplify the entire Reliability Standards regime. NERC could take a step in this direction by recognizing the varying degree of importance of the variety of NERC Standards and acknowledge that some of them are indeed key for ensuring BES reliability, while others have a comparatively minor impact. This “reliability tier” should continue with enforcement in accordance with the existing CEP. The remaining Standards in the second tier should be reduced to “guidelines” or “criteria” without penalties and sanctions. Such action would not compromise BES reliability, yet it would allow a dramatic reduction in audit compliance effort and expense to the industry. Essentially, this sort of movement would focus compliance efforts in the areas that can truly influence continued reliability and do so in an efficient manner for the industry.
44	Recommendation 1: The GO and TO registrations issues needs to be resolved. Recommendation 2: Alignment is needed between the Functional Model Document, NERC's Registration Criteria and reliability standards. This has resulted in major chaos within the standards. There are some standards that contain entities that are no longer in the Functional Model Document as well as those that exist in the Functional Model Document but are not included in the applicable standard. Recommendation 3: Regions should not be able to add applicable entities when drafting ‘fill in the blank’ standards nor should they be able to ignore NERC’s directives when drafting regional standards. As an example NERC’s UFLS Regional Reliability Standard Characteristics @ 5 reads “The Standard shall coordinate with PRC-024 Generator Performance during Frequency and Voltage Excursions by requiring that UFLS programs complete execution before generators begin to trip on underfrequency. Generator underfrequency trip settings are not subject to this directive.” Yet both RFC and SERC’s regional standards contain requirements that generator underfrequency trip settings either conform to regional standards or that the generator owner acquire ‘load shed service’.
45	Recommendation(s): a) Shorten the time period required to develop standards b) Require NERC to review and update its functional model, as necessary, at least every two years
46	Revise the Reliability Standards so that it is clear to the Applicable Entities what is required to be submitted in order to adequately demonstrate compliance. This is not to be construed as telling the entities that so long as these documents are submitted they will not have any violations. What it will do is to clarify the expectations.
47	See comments and recommendations under various questions above
48	See questions 1,3,5 for comments. R1. DP's & LSE's should be reevaluated for applicability on some standards. R2. Remove DP or LSE & make only one function. There are (2) function titles that have almost the same meaning. R3. "Emails". It would be nice to only receive emails that are applicable to our company. (example) If a standard is listed for a TOP or GO, then the email shouldn't be sent to a DP. R4. It would be nice if Nerc would provide a forum on their website so entities could communicate with each other on different topics involving Reliability Standards. Entities could log onto the forum & go to the topics or even start a new thread topic to discuss. The forum would provide alot of feedback for Nerc & help other entities that have questions.

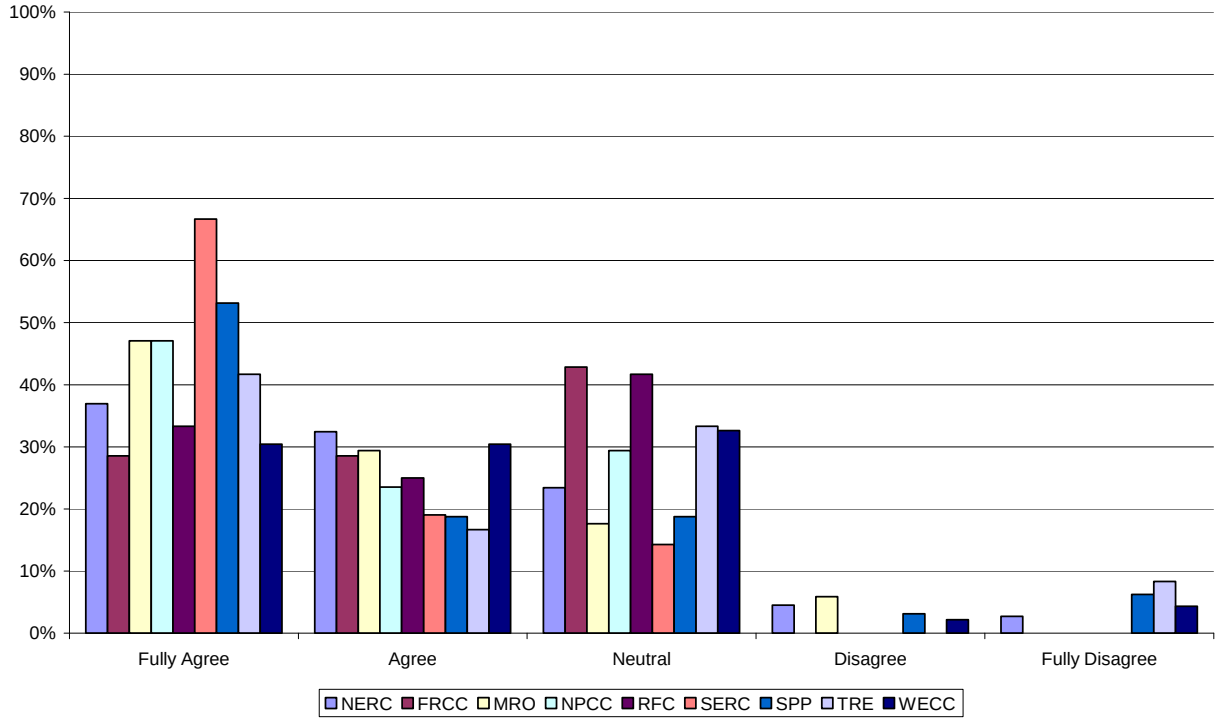
	Comments and recommendations for improvement (specifically number recommendations, i.e. Recommendation 1):
49	The system is designed for big utilities. Make it user friendly for every stakeholder. The amendment process needs to be streamlined and allow for distance meetings. The compliance process needs major revion and clarification. Rules change and are amended with instant effects. There is no consistantcy in the RSAWs and no compliance training for stakeholders. Why can't we have audit trainining as well? It sometimes appears as though NERC can't eplain the Reliability Standards or necessary evidence either.
50	There are no comments or recommendations at this time.
51	We support the comments sent by EEI.

Compliance

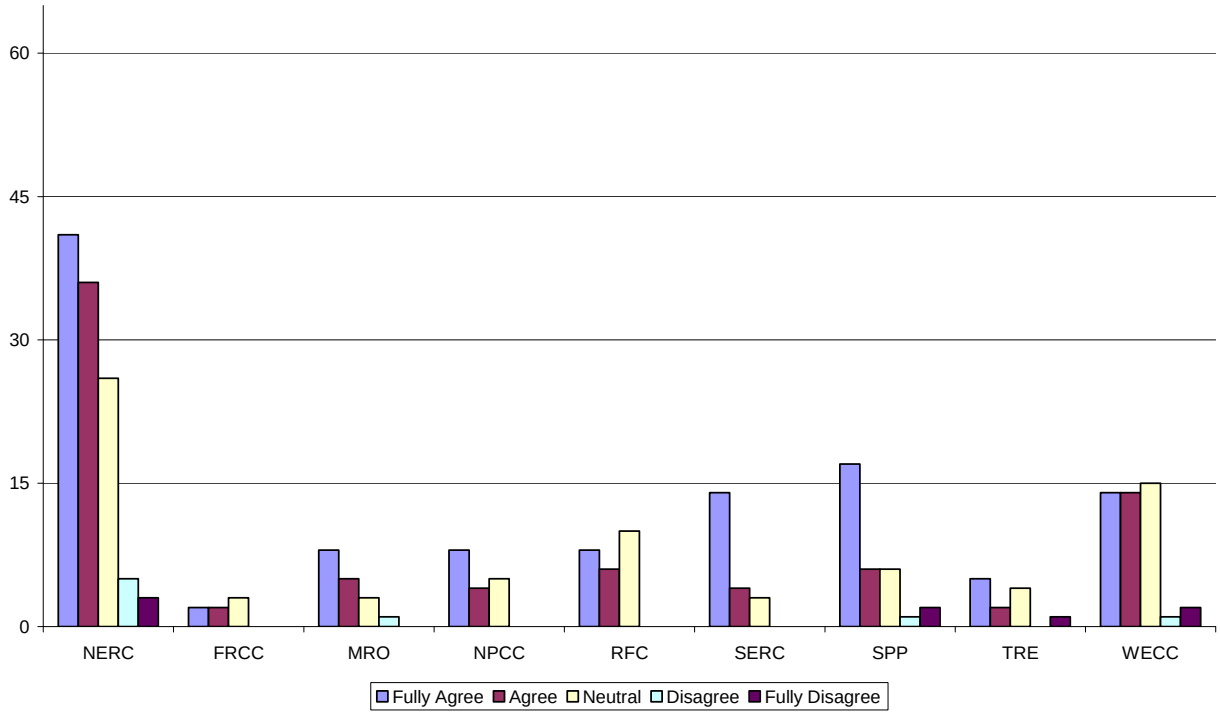
12. Based on your experience, NERC/Regional Entity's compliance monitoring and enforcement program comprehensively covers all requirements of reliability standards applicable to your operations and does not leave gaps in the monitoring of compliance with these requirements.

	NA – Not applicable or have no opinion	1 – Fully agree	2	3 – Neutral	4	5 – Fully Disagree	Response Count
NERC	5.9% (7)	**34.7% (41)**	30.5% (36)	22.0% (26)	4.2% (5)	2.5% (3)	118
FRCC	**83.7% (36)**	4.7% (2)	4.7% (2)	7.0% (3)	0.0% (0)	0.0% (0)	43
MRO	**65.3% (32)**	16.3% (8)	10.2% (5)	6.1% (3)	2.0% (1)	0.0% (0)	49
NPCC	**63.0% (29)**	17.4% (8)	8.7% (4)	10.9% (5)	0.0% (0)	0.0% (0)	46
RFC	**53.8% (28)**	15.4% (8)	11.5% (6)	19.2% (10)	0.0% (0)	0.0% (0)	52
SERC	**58.0% (29)**	28.0% (14)	8.0% (4)	6.0% (3)	0.0% (0)	0.0% (0)	50
SPP	**43.9% (25)**	29.8% (17)	10.5% (6)	10.5% (6)	1.8% (1)	3.5% (2)	57
TRE	**72.1% (31)**	11.6% (5)	4.7% (2)	9.3% (4)	0.0% (0)	2.3% (1)	43
WECC	**36.1% (26)**	19.4% (14)	19.4% (14)	20.8% (15)	1.4% (1)	2.8% (2)	72
					Comments and recommendations:		31
						answered question	**128**
						skipped question	**14**

ERO Survey - Compliance
Question 12



ERO Survey - Compliance
Question 12



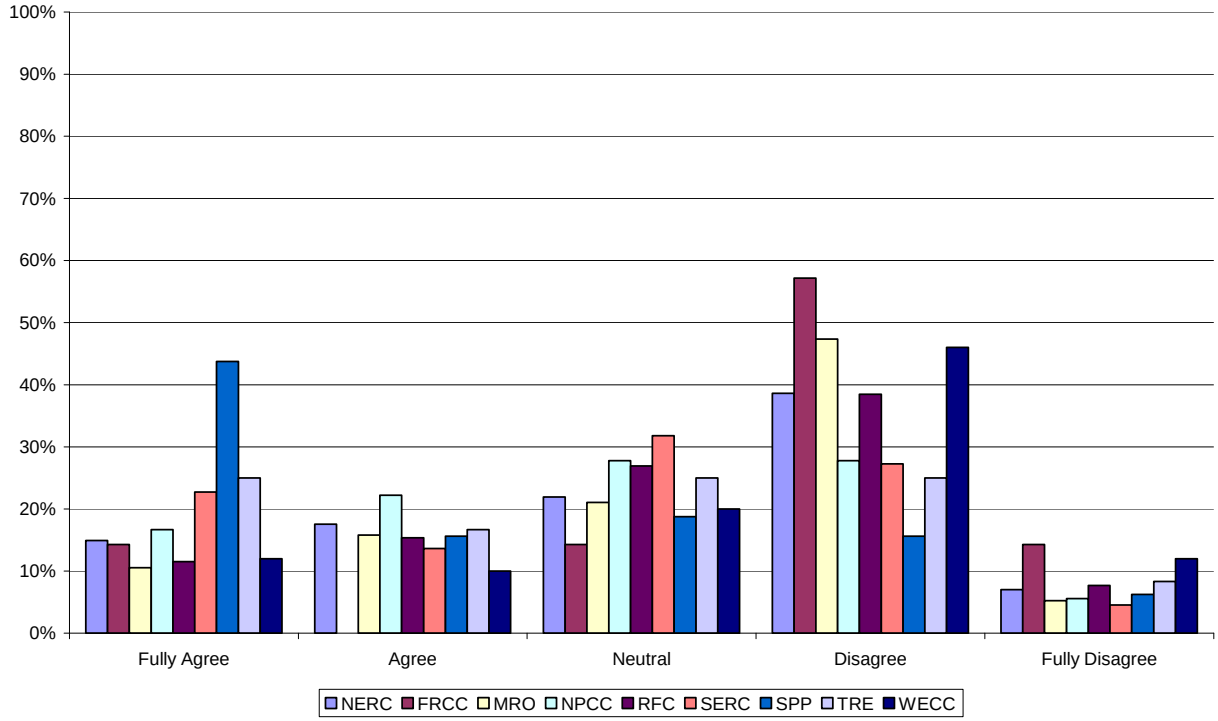
	Comments and recommendations:
1	APPA can not comment on each of the regional CMEPs, but its perceptio is these programs look better on paper than they perform in practice.
2	During two onsite compliance audits, not all enforceable standards were reviewed, only those that were actively monitored.
3	I believe that NERC and the REs have done a very good job in covering any gaps between standards. If anything, I beieve that we have gone "overboard" on certain requirements. For example, if an entity is registered for several functions (BA, GO, GOP, PSE, LSE,, etc.), we need to create exemptions where some requirements are waved because they have already been covered under a previous fucntion to avoid duplicity of documention. We need to continue focusing on the reilaibltiy of the system and not the paperwork needed to prove one is compliant.
4	It appears that the focus on compliance is more on documentation and the proper wording of the documents rather than on actual performance. In other words, the focus should be on whether a utility does what is required rather than whether they document their actions.
5	It is SPP's understanding that compliance audits of a registered entity covers all facets of a registered entity's responsibilities. Although the Annual Compliance Program focuses on a specific number of NERC standards, during the audit, NERC may review and make findings on any approved standard as well as make recommendations on reliability matters that may not be directly related to a requirement under an approved standard. We find this as an efficient and beneficial use of SPP and NERC staff time when an audit is performed.
6	Manitoba Hydro uses a different CMEP as agreed to by MRO and NERC.
7	NERC For the 2009 CMEP, NERC has a prioritized approach to standards that will be monitored for compliance. What is less known, is how NERC plans to address compliance to the full comprehensive set of standards and associated requirements going forward. It is not readily feasible to perform compliance audits for each and every standard at the time of an audit. NERC should propose a systematic approach to measuring compliance that incorporates a portioning of standards into a multi-year compliance reviews schedule in order to ensure compliance to all standards.
8	NERC NERC should continue with its risk-based approach to auditing. NPCC NPCC compliance monitoring and enforcement program (CMEP) is primarily driven by NERC's compliance program. NPCC only determines the schedule for its CMEP. NPCC should integrate compliance with criteria and regional standards with its compliance monitoring and enforcement program (CMEP). The integration should also be reflected in its on-line compliance and enforcement tool, the CDAA, which could serve as a one-stop shop for compliance with all applicable reliability standards and criteria be it NERC or Regional Entities.
9	NERC CMEP program covers all requirements and does not leave any gaps. However, we believe that not all of the standards have been scheduled for monitoring since June 18, 2007. SERC CMEP program covers all standards monitored by NERC as well as a few other standards. It does not leave any gaps.
10	NERC should continue with its risk-based approach to auditing.
11	None
12	On the contrary, rather than leaving "gaps", it is more likely that there is significant and inefficient "overlap' in the coverage.
13	See comment under 2-1 above.
14	Since compliance monitoring and enforcement is based on a set of mandatory reliability standards, it is evolving toward this goal. As existing standards are refined, new standards are developed to cover the gaps, and enforcement practices are refined, It is important to keep focused on the larger items that have an impact on reliability and not on administrative details. We do appreciate NERC's view of prioritizing a set of standards to monitor in a given year rather diminishing the effectiveness over a much wider range.
15	Since we have not had an "official" audit that was fineable, it is hard to say. Tacoma Power thinks there may be some gaps in the NERC audit due to looking only at our paperwork. In the WECC reliability audit, they looked at the paperwork as well as talked to people. Hopefully the 2010 audit will standardize techniques.
16	SPP has been very helpful with CWL in the development of our Compliance Program. This has been and continues to be a very beneficial to CWL. CWL went through a compliance audit in the Spring of 2008. SPP and NERC were very thorough with their evaluation of CWL. In our opinion, the potential for leaving compliance gaps is minimal.
17	The 2009 NERC CMEP Implementation Plan does seem to be appropriately prioritizing standards to be monitored for compliance. It is probably too early in the mandatory compliance process to definitively answer this question. Not all of the standards have been scheduled for monitoring since June 18, 2007.

	Comments and recommendations:
18	The 2009 NERC CMEP Implementation Plan does seem to be appropriately prioritizing standards to be monitored for compliance. It is probably too early in the mandatory compliance process to definitively answer this question. Not all of the standards have been scheduled for monitoring since June 18, 2007. For example, in RFC, there have been no requests for self-certification of PRC-001.
19	The 2009 NERC CMEP Implementation Plan does seem to be appropriately prioritizing standards to be monitored for compliance. It is probably too early in the mandatory compliance process to definitively answer this question. Not all of the standards have been scheduled for monitoring since June 18, 2007. For example, in RFC, there have been no requests for self-certification of PRC-001.
20	The CMEP does address all standards through various mechanisms. There does need to be better guidance on the handling of non-contiguous BA's.
21	The CMEP is a very indepth program. It is backed up the NERC audit Guide, consisting of 490 pages. Some standards have questions that are over 30 pages. Overwhelming for a all entities. A lot of time and resources has to be available in order to fulfill the requirements of ensuring compliance, not to mention the time to fill out the audit guide. Then the regional entity has to review the guide, make a trip to the entity and have a several day face to face audit.
22	The compliance and enforcement programs rightly focus on the standards most significant to reliability. However, too much attention is paid to administration of documentation, literal words and RSAWs, rather than elements of operational performance.
23	The compliance monitoring and Enforcement Programs administered by NERC and the Regional Entities have a breath and scope that assures sufficient monitoring of compliance. The program use of audits, spot checks, self-certifications, event analysis, and investigation comprehensively monitor compliance.
24	The document does provide a clear indication of the requirements, however, reporting requirements should be included in all of them for each reporting year.
25	The NERC Reliability Audit Standard Audit Worksheets (RSAWs) that NERC created and posts on its website are helpful to both auditors and those utilities being audited. However in some instances NERC and the REs are using RSAWs during audits that include ”requirements” exceeding those currently included in FERC approved Reliability Standards. These “requirements” consist of FERC directives that have not been approved through the NERC standards development process and FERC. Audits must be focused solely on compliance with only those requirements that have been approved by FERC. Audits should not include compliance with FERC directives that have not been evaluated and approved through the NERC standards development process and FERC.
26	The NERC/Regional CMEP Implementation Plan does cover all requirements appropriately prioritizing standards to be monitored for compliance.
27	The standards and requirements go way too far. The definitions in standard glossary, the standards, and registration criteria have broadened the scope of reliability to address local system customer service levels.
28	The WECC CMEP, especially the Nov 2008 version, is expecially well-written. In 2008, the magnitude of effectively performing the monitoring and enforcement activities as written seemed to overwhelm available WECC resources. The initial corrective actions in early 2008 were a little choppy (e.g. not reviewing Spot Audit evidence filings, long delays in completing Spot Audit reviews, Mitigation Plans & Mitigation Plan Completions), but as 2008 progressed, the needed WECC resources appeared to be added, and with some really good talent (especially in the CIP area).
29	There is a need to better define which reliability standards/requirements really need to apply to small entities (e.g., small DP, small LSE, small TO, etc.) for protecting the reliability of the BPS. A good example is the WECC "LSE/DP MOU on Compliance". A similar iniative is needed continent-wide, and needs to include the TO and TOP functions at a minimum.
30	This question wrongly assumes that registered entities fully understand what is required of them to demonstrate compliance. It is nearly impossible to get clarifying information regarding standards applicability and compliance responsibility from WECC. TANC has tried many times.
31	Two key standards to DPs do not ever seem to be reviewed. TOP-001 and FAC-002 don't appear to be monitored.

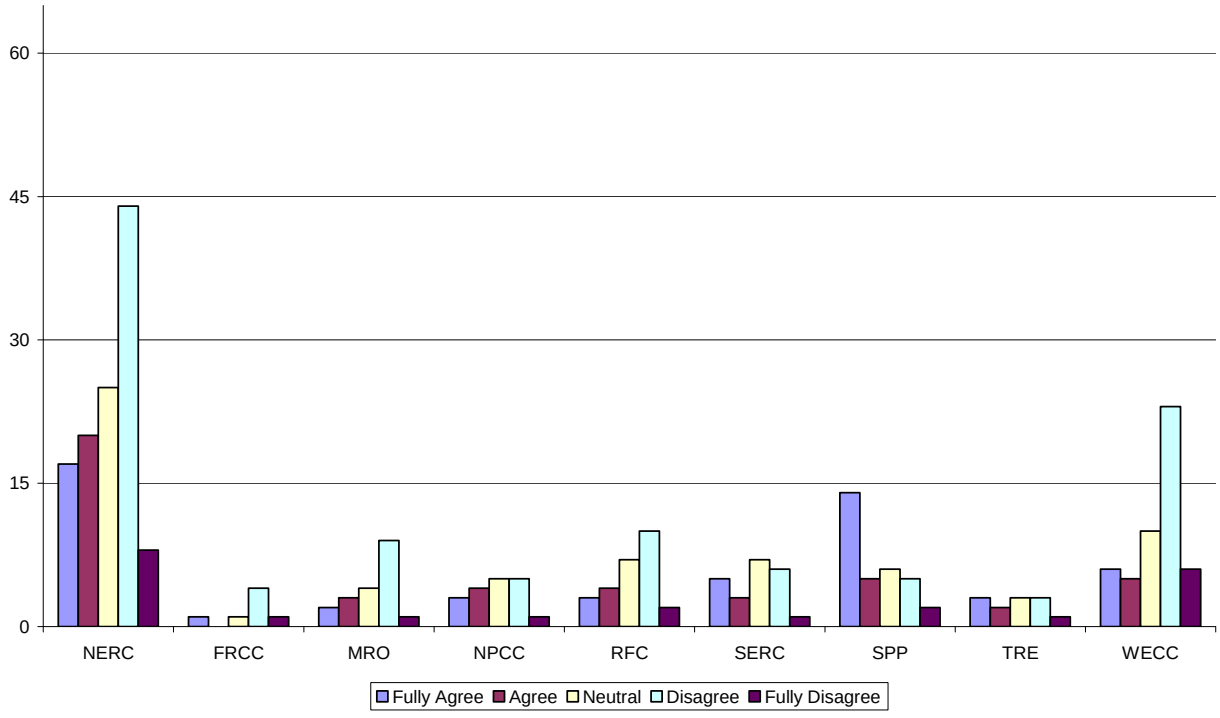
13. Provides clear readily available and accessible information on what level of performance is necessary to comply with requirements of applicable reliability standards and what documentation and other evidence is needed to demonstrate compliance.

	NA – Not applicable or have no opinion	1 – Fully agree	2	3 – Neutral	4	5 – Fully Disagree	Response Count
NERC	1.7% (2)	14.7% (17)	17.2% (20)	21.6% (25)	**37.9% (44)**	6.9% (8)	116
FRCC	**83.7% (36)**	2.3% (1)	0.0% (0)	2.3% (1)	9.3% (4)	2.3% (1)	43
MRO	**62.7% (32)**	3.9% (2)	5.9% (3)	7.8% (4)	17.6% (9)	2.0% (1)	51
NPCC	**61.7% (29)**	6.4% (3)	8.5% (4)	10.6% (5)	10.6% (5)	2.1% (1)	47
RFC	**52.7% (29)**	5.5% (3)	7.3% (4)	12.7% (7)	18.2% (10)	3.6% (2)	55
SERC	**56.0% (28)**	10.0% (5)	6.0% (3)	14.0% (7)	12.0% (6)	2.0% (1)	50
SPP	**43.9% (25)**	24.6% (14)	8.8% (5)	10.5% (6)	8.8% (5)	3.5% (2)	57
TRE	**72.1% (31)**	7.0% (3)	4.7% (2)	7.0% (3)	7.0% (3)	2.3% (1)	43
WECC	**31.5% (23)**	8.2% (6)	6.8% (5)	13.7% (10)	**31.5% (23)**	8.2% (6)	73
					Comments and recommendations:		61
						answered question	**125**
						skipped question	**17**

ERO Survey - Compliance
Question 13



ERO Survey - Compliance
Question 13



	Comments and recommendations:
1	1) A process should be developed that can allow entities to deal with issues of potential non-compliance without fear of retribution. Something akin to 5th Ammendment rights or settlement rules that cannot be used in litigation.
2	1. Level is subjective to individual reviewer. Compliance is more about paperwork than it is about reliable operation.
3	Although the RSAWS are available, there were still a few unclear requests regarding what evidence is required to demonstrate compliance. When asked for guidance, it was a little difficult to get a straight answer and was told that they can not tell you what you need as that would defeat the purpose of being audited.
4	Although we understand that there are some efforts to remedy this situation, the compliance staff have been reluctant to provide information regarding the level of performance necessary to comply with requirements. There does not appear to be a regulatory emphasis on assisting entities to achieve the desired levels of performance and documentation of evidence, but rather a stronger emphasis on maintaining the ability to penalize failure. A stronger focus on reliability, with compliance as a means to this end, rather than a singular focus on compliance as the goal would facilitate staff in the development of mechanisms to develop the needed guidance.
5	APPA members in WECC have repeatedly requested information to clarify what data is required to demonstrate compliance. WECC, which appears to be overloaded by its compliance violation backlog, has been unresponsive. In general, compliance staffs in all regions are reluctant to opine on the information that would be required to demonstrate compliance beyond filing out the RSAWs in advance. Self reports and proposed compliance mitigation plans aresubmitted but receive no response from the RE until months later.
6	AS A SMALL UTILITY IT HAS BEEN OVERWELMING PUTTING ALL DATA TOGETHER AND LEARNING THE COORECT/ACCETABLE DOCUMENTS TO BE IN COMPLAINCE. THERE SHOULD BEEN MORE OF START UP PERIOD FOR TRAINING AND FULL ENFORCEMENT WITH FINES Just needed more semairs. we all are learnig as we go includinG NERC AND RFC STAFF.
7	As previously indicated, there is currently no apparent direct correlation between performance and compliance. Even if an entity performs effectively to the requirements of a standard (i.e. their performance protects and maintains the reliability of the bulk power system), that entity may be found in violation of those requirements if its documentation does not conform to the expectations of NERC and/or regional entity during an audit. This problem is exacerbated by the fact that NERC and regional entities are reluctant to indicate what documentation and other evidence effectively demonstrates compliance. This reluctance is rationalized by indications that it would a conflict of interest for NERC and/or the regional entities to provide guidance on matters for which they audit. If the objective of the reliability standards is to ensure the reliability of the bulk power system, then it seems that NERC and the regional entities should be interested in assisting registered entities in their efforts to perform to and comply with the standards.
8	BPA is strongly in support of the RRO Compliance Managers effort to provide examples (http://www.regionalentities.com/).
9	Continuous process improvement will be important in specification of documentation and evidence necessary to demonstrate compliance. Standards should continue to improve based on the "lessons learned" from audits and stakeholder input. Since the RSAWs are developed separate from the standards development process, there exists opportunities inconsistencies to emerge. Unfortunately, the only time to understand the "level of performance necessary" is when an entity is audited. This lack of understanding is further exacerbated by the backlog of compliance violations that would provide the industry with a better understanding of the the documentation and evidence will need to be demonstrated.
10	Due to their position as auditors, there has been reluctance on the part of the NERC and the WECC to provide good definitions or examples of the level of performance or types of evidence necessary to be compliant.
11	From NERC, this information is not very clear. From WECC, this type of information seems to be nonexistent. Compliance seems to be determined more by what person you talk to than by what the standards state and what the company is doing.
12	Has improved over the past year and moving forward
13	I gave SERC a higher rating here because they have now begun holding free seminars and web based training to help registered entities understand whats, whys, and hows associated with demonstated compliance.

	Comments and recommendations:
14	It is not clear readily available or accessible on what information is considered evidence. This has become apparant to us during our spot checks and audits. As we do not have recorded telephone calls. When I have proposed the question to the different regions, I have not been able to receive any further clarification. They tell us that they can only clarify the standard and not provide specific examples of what constitutes evidence. This has been very difficult.
15	Level of performance is often not clear. For example, most measures for standards compliance state “shall have evidence”… There is no way to determine whether the quality or type of evidence adequately meets the standard
16	Many of the standards lack clarity. They have room for interpretation that must be sought elsewhere and sometimes it's frustrating because it seems like one must go to a workshop to get any clear understanding. In these days of economic belt tightening, it would be good for us to not have to go to workshops all the time. In comparison, the Nuclear Regulatory Commission issues Regulatory Guides that add greater insight into how to meet their requirements. NERC ought to consider developing similar type documents.
17	Many standards are open to interpretation on exactly what is needed for compliance.
18	Many standards are vague and it takes more time to figure out what is wanted than it actually takes to comply. Example: FAC-008 R1 reads "A statement that a Facility Rating shall equal the most limiting applicable Equipment Rating of the individual equipment that comprises that Facility." We initially had a full description of summer and winter capacity tests the established equipment ratings for this facilty." We were given a violation because we did not have the following statement: "The Fountain Valley Power Rating shall equal the most limiting applicable Equipment Rating of the individual equipment that comprises Fountain Valley." This is obvious and has no meaningful information, but we got a violation for it anyway.
19	Many standards do not provide clear direction on the measures that will demonstrate compliance with the requirements.
20	NERC NERC has struggled to provide enough information available to the industry on what both what constitutes compliance as well as what documentation and evidence is required to substantiate compliance. Clearly, the standards in many cases describe that documentation of specific functions must exist but within the audit process, such documents are often debated for their viability as compliance evidence. NERC must strengthen language in the standards where documentation demands occur so that entities can discern what elements are required within the documentation. NERC must should train and provide guidance to compliance audit teams so that a proper evaluation of the submitted documentation occurs. NERC must also work more closely with the Regional Entities in order to provide greater consistency among the regions for compliance judgments related to documentation requirements for compliance.
21	NERC NERC Reliability Standards Audit Worksheets (RSAWs) are a step in the right direction for providing guidelines to auditors and ensuring consistency in the way audits are approached across regions. However, there are some improvements needed in these RSAWs to explain what exactly is the evidence required as opposed to simply restating the requirement which is the case in certain instances. Additional clarification would help significantly. If possible, NERC should develop a companion database to the standards that link the requirements, measures, and RSAW information. NERC should also encourage regions to integrate compliance with NERC standards and compliance with regional standards and criteria into one CMEP program and schedule. This would help in eliminating the current practice of having multiple cumbersome processes and would streamline the various compliance programs. NPCC NPCC should assist NERC in developing new RSAW and refining existing RSAWs based on the regional audits that it conducts. In fact regional entities by the virtue of their compliance audits are best positioned to advise NERC regarding RSAW revisions. Additionally, NPCC should provide an on-line resource or database from which the industry can obtain reasonable information on what constitutes “good evidence” for meeting standard and criteria requirements. This would definitely help entities and the NPCC during compliance audits and make these audits more efficient and meaningful for all involved.
22	NERC - The evidence required to meet standards is not clear as the levels of evidence differs between regions.
23	NERC and NPCC could provide more lessons learned from confirmed violations in order to determine what doesn't demonstrate compliance. RSAW's are tools that are used to provide guidance on what the regional audit staff will be looking for.

	Comments and recommendations:
24	NERC and RFC- For many standards, information is not provided on the level of performance necessary to comply with requirements of applicable reliability standards and what documentation or other evidence is needed to demonstrate compliance. An entity should not have to look at the Reliability Standard Audit Worksheets (RSAWs) to determine how to meet a standard requirement. The standard itself should include this information since it is the document that passes the stakeholder's vote and receives FERC/NERC approval. The stakeholders do not write or pass the RSAWs, but entities have to use RSAWS to ensure they are in compliant with a standard. In addition, some RSAWs appear to require compliance elements that go beyond the scope of the actual standards.
25	NERC and the Regional Entities have not provided clear, readily available, and accessible information as to what definitively constitutes an adequate level of compliance. Furthermore, there does not appear to be a process to ensure regional consistency. The RSAWs are effectively adding additional requirements to the Standards. NERC's inability to process Violations in a timely manner has hindered the industry's abilities to learn from each other and incorporate lessons learned into planning and operations process improvements to support bulk power system reliability.
26	NERC and the Regions have not adequately provided clear information as to what definitively constitutes an adequate level of compliance. The RSAWs used by the Regions for the required level of evidence sometimes does not necessary correspond to the standard requirement.
27	NERC and the Regions have not provided clear readily available and accessible information as to what definitively constitutes an adequate level of compliance. Furthermore, there does not appear to be a process to ensure regional consistency. The RSAWs are effectively adding additional requirements to the Standards. NERC's inability to process Violations in a timely manner has hindered the industry's abilities to learn from each other and incorporate lessons learned into process improvements.
28	NERC and the Regions have not provided clear readily available and accessible information as to what definitively constitutes an adequate level of compliance. Furthermore, there does not appear to be a process to ensure regional consistency. The RSAWs are effectively adding additional requirements to the Standards. NERC's inability to process Violations in a timely manner has hindered the industry's abilities to learn from each other and incorporate lessons learned into process improvements. Exelon feels that the information that has been posted on www.regionalentities.org is a positive development. However, this information is currently at a high level and does not provide specific guidance for particular requirements.
29	NERC and the Regions have not provided clear readily available and accessible information as to what definitively constitutes an adequate level of compliance. Furthermore, there does not appear to be a process to ensure regional consistency. Without any guidance from NERC or the regions the entities have the burden to interpret the requirement applying FERC's Order 693 and NERC's RSAWS that are in some cases created additional requirements that expand the compliance obligations. To satisfy the requirements compliance obligations, Dominion developed reliability standards guideline templates to help Dominion's business units develop an overall compliance structure to the NERC Standards. The templates are intended to provide clarity to the requirements and measures of the reliability standards.
30	NERC has not provided clear readily available and accessible information as to what definitively constitutes an adequate level of compliance. Furthermore, there does not appear to be a process to ensure regional consistency. The RSAW in some cases appear to go beyond the requirement of the standard or effectively add additional requirements to the Standards. Inclusion of examples of adequate level of compliance in RSAWs would be very helpful. NERC's inability to process Violations in a timely manner has hindered the industry's abilities to learn from each other and incorporate lessons learned into process improvements. SERC provides compliance related information through seminars and open forum webinars, and allow industry subject matter experts to participate on the audit team. However, these do not equates to clear readily available and accessible information as to what definitively constitutes an adequate level of compliance. Furthermore, there does not appear to be a process to ensure regional consistency. The RSAW in some cases appear to go beyond the requirement of the standard or effectively add additional requirements to the Standards. Inclusion of examples of adequate level of compliance in RSAWs would be very helpful. SERC provides reporting period for self-certification with each standard. RFC has not provided clear readily available and accessible information as to what definitively constitutes an adequate level of compliance. Furthermore, there does not appear to be a process to ensure regional consistency. The RSAW in some cases appear to go beyond the requirement of the standard or effectively add additional requirements to the Standards. Inclusion of examples of adequate level of compliance in RSAWs would be very helpful RFC does not provide reporting period for self-certification similar to SERC. This is one of the examples of inconsistency among regions.
31	NERC needs to be clearer on what is expected to document compliance. Alternatively, auditors need to be more open to reviewing and discussing materials presented by the Registered Entities.

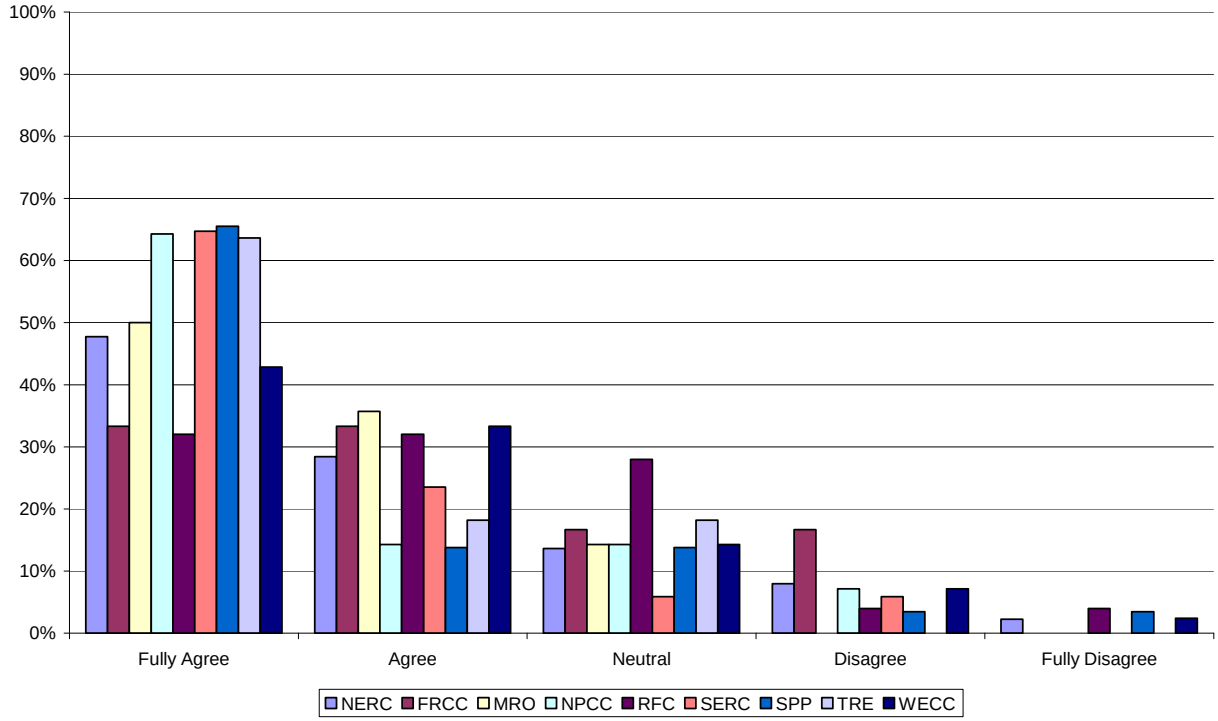
	Comments and recommendations:
32	NERC Reliability Standards Audit Worksheets (RSAWs) are a step in the right direction for providing guidelines to auditors and ensuring consistency in the way audits are approached across regions. However, there are some improvements needed in these RSAWs to explain what exactly is the evidence required as opposed to simply restating the requirement which is the case in certain instances. Additional clarification would help significantly. References to subjective opinions must not be included in the RSAWS. NERC may want to consider developing a companion database to the standards that link the requirements, measures, and RSAW information.
33	NERC/RFC: Q2: NERC should take a stronger role in uniformity and consistency of performance levels across all regions. Interpretation and clarification requests have not been answered in a timely manner; however, the regional entity website is a step in the right direction.
34	NPCC's rewriting of its 3 levels of documentation as "Directories" will improve the level of performance and documentation understanding
35	Performance information for adequate compliance is not always accessible for Registered Entities. A template of best practices has not emerged in a transparent fashion to which Industry has access. Consequently, industry continues to grapple with what constitutes an adequate level of compliance. Moreover, industry stakeholders lack clear and consistent direction or guidance regarding the adequate level of evidence needed to demonstrate compliance with a standard.
36	Regulatory expectations are formulated by lessons-learned and industry experiences. NERC's inability to timely process and make public regulatory audits and penalty determinations has slowed our ability to learn from industry experience.
37	Required performance is pretty clear for an entity to follow. BUT the RSAWs that an auditor will use in a compliance audit have not been vetted to the industry and contain some wrong information. In the RSAW for PER-002, the last page states: P1372 "…the Reliability Standard should apply to operations planning and operations support staff that have a direct impact on the reliable operation of the Bulk-Power System.373 We clarify that these personnel include those who carry out outage coordination and assessments in accordance with Reliability Standards IRO-004-1 and TOP-002-2, and those who determine SOLs and IROLs or operating nomograms in accordance with Reliability Standards IRO-005-1 and TOP-004-0…." Does this mean personnel other than System Operators (BA., TOP, and RC) need to be NERC Certified? The actual FERC order states: 1372. The Commission directs the ERO to "develop a modification" to PER-002-0 that extends applicability to the operations planning and operations support staff of transmission operators and balancing authorities, as clarified below. Most commenters express concern about extending the applicability of the Reliability Standard because they believe "operations planning" and "operations support" are not well-defined and could encompass a significant number of operations personnel. In the NOPR, the Commission stated that the Reliability Standard should apply to operations planning and operations support staff that have a direct impact on the reliable operation of the Bulk- Power System.373 We clarify that these personnel include those who carry out outage coordination and assessments in accordance with Reliability Standards IRO-004-1 and TOP-002-2, and those who determine SOLs and IROLs or operating nomograms in accordance with Reliability Standards IRO-005-1 and TOP-004-0. The Commission directs the ERO to include in PER-002-0, personnel who carry out the above functions. Was the RSAW FERC comment taken out content? This can be looked at as not part of a requirement and "someone" is slowly adding items into RSAWs. These need to be vetted to thd industry or reviewed by a third party outside of NERC.
38	Since there have been so few audits, there isn't enough history amongst the industry and the regional entities to share a concise level of what documentation and evidence is adequate to pass an audit. I think the regional entities need to sponsor more seminars where examples of adequate documentation are presented.
39	SPP and SPA, our balancing area, have been instrumental with the understanding and development of our compliance program.
40	SPP is a party to the IRC Standards Review Comments, please refer to that submittal for our response to this question.
41	Sufficient guidance is not given to address which of multiple interpretations should be followed.
42	Th
43	The addition of RSAWS has helped but still fall short of clarity and level of performance required to comply.
44	The CIP Standards are not as clear as preferred. SPP RE has been very approachable on areas in question.

	Comments and recommendations:
45	The documentation and evidence required to demonstrate compliance to a particular requirement is subject to the interpretation of the regulator. PPL has used outside consultants experienced in conducting and participating in NERC audits to bolster internal understanding of what is required to evidence compliance. This is an expensive approach for each company to implement independently. Note that the Measures are different from the evidence required to demonstrate that the measure has been attained. An approach beneficial to the industry could be NERC training on evidence. A generic on-line course could be put together that takes each standard and discusses the types of evidence needed to demonstrate compliance. The course could have modules focused on different NERC functions, i.e., signing up for the GO/GOP module would address only those standards applicable to these functions. The course could have the appropriate disclaimers indicating that Registered Entities have the ultimate responsibility to determine the level of evidence adequate for their circumstances. The bottom line is that most Registered Entities want to comply with the standards in the most cost effective manner. Evidence Training provided by NERC would serve the Registered Entities well.
46	The intent is very good, but the details are still evolving (e.g. PSP & ESP interdependance in some CIP standards, and inclusions of specific protection system elements in PRC-005-1)
47	The issue is not with compliance, but with the standards.
48	The level of documentation required to demonstrate compliance is often unclear. Going into our audit, we were not sure how much documentation was needed to prove we are compliant. In addition, we were asked to provide documentation to support that something had not happened (in effect, to prove a negative). This was difficult to do.
49	The NERC RSAWs are readily available and accessible. They are not clear. The pre-audit questioning sometimes asks questions that are confusing. As stated earlier, one of the reasons for this is that some standards are applicable to both a BA and a TOP. The line of questioning seems to be related to a required action of a BA and seems to have no bearing on a stand-alone TOP.
50	The process is getting better but it has often been difficult to get any guidance on specifics required.
51	The Requirement text is fairly clear; however, when the Auditors conduct their audit work, they seem to introduce interpretations that are not in the text of the Requirements. Prime example is an audit finding on TPL-001 R1.3, in which the Requirement states that the entity shall conduct the prescribed studies "over a range of demand". The audit team alleged a violation, which we are still disputing, because they felt the Requirement meant that different seasons had to be studied. That is not what the Requirement states, and yet we have been held up as being in non-compliance based on the audit team's interpretation. WECC does hold industry forums under its Compliance Users Group program. These are fairly informative; however, WECC has not and will not use these opportunities to help the registered entities with evidence assistance. WECC has specifically refused to answer the question: “what evidence are you looking for?”, and they seem unwilling to provide examples of suitable evidence strategies. This is unfortunate, as the registered entities can only learn what is expected through trial and error at the risk of substantial penalties along the way.
52	The standards and audit teams do not provide clear or available information on what is expected for many standards. Instead questions are phrased as written in the standard, with the entity providing what they think meets the requirement. There is no clear guidance for either auditors or entities on many requirements at to what actually constitutes compliance.
53	The standards are not clear on documentation and evidence requirements. The standards do not define evidence requirements and evidentiary requirements seem to vary auditor by auditor, audit by audit. One example of the unclear and conflicting information provided by RROs is the issuance of the new RSAWs in November, 2008 by NERC. WECC has stated that the new RSAWS are both mandatory and not mandatory. Despite attempts to gain clarity on this issue, three months later, the issue remains unresolved.
54	The WECC outreach program has provided excellent information on the standards they've covered to date. MORE! Sometimes the more you struggle to make something clear, the more difficult it becomes to wade through the information. Some standards are still too vague and are left to subjective interpretation.
55	There has been absolutely no guidance on what evidence is needed to demonstrate compliance
56	There has been no clear guidance on what constitutes compliance. The RSAWs have added additional levels of requirements and obligations to the standards.
57	There is a need to focus existing resources on the developement of Guidelines for compliance with existing reliability standards.
58	There is little guidance as to what constitutes evidence, but plenty of rhetoric about the burden of proof being on the utility. Tell us what you want!

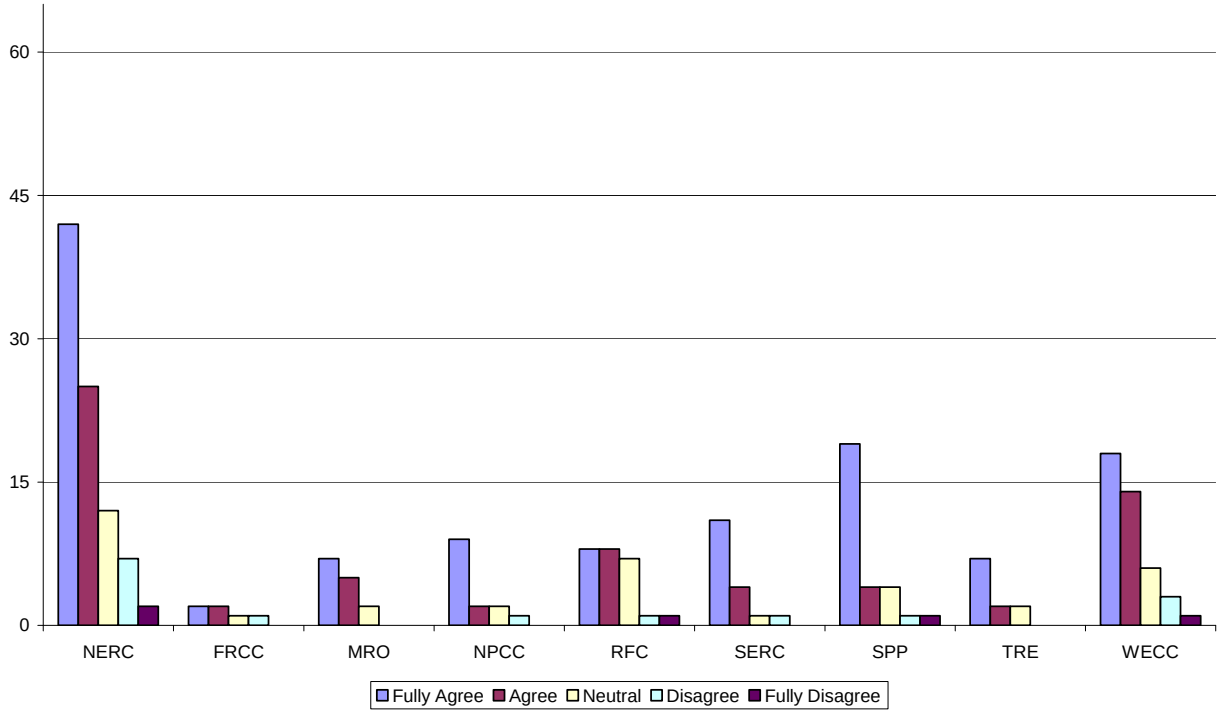
	Comments and recommendations:
59	There is often a lack of clarity in the standards as to what is required to demonstrate compliance. Measures do not exist for many requirements. In some cases, the measures are vague and can be interpreted in many ways.
60	There needs to be improved clarity on what is required for full compliance. Often the speed limit analogy is used to describe the NERC compliance program, in that an entity is either compliant or they are not; uiin the same fashion as either someone is either speed ing or they are not. If that analogy is to be used then the standards need to be as clear as a speed limit sign with respect to what is required to be fully compliant.
61	To the extent that standards require documentation to prove performance, it would be helpful if NERC could provide examples of acceptable types of documentation

14. Provides reasonable notice of compliance audits, including information that will be required during the audit process.							
	NA – Not applicable or have no opinion	1 – Fully agree	2	3 – Neutral	4	5 – Fully Disagree	Response Count
NERC	22.8% (26)	**36.8% (42)**	21.9% (25)	10.5% (12)	6.1% (7)	1.8% (2)	114
FRCC	**85.7% (36)**	4.8% (2)	4.8% (2)	2.4% (1)	2.4% (1)	0.0% (0)	42
MRO	**70.8% (34)**	14.6% (7)	10.4% (5)	4.2% (2)	0.0% (0)	0.0% (0)	48
NPCC	**70.2% (33)**	19.1% (9)	4.3% (2)	4.3% (2)	2.1% (1)	0.0% (0)	47
RFC	**54.5% (30)**	14.5% (8)	14.5% (8)	12.7% (7)	1.8% (1)	1.8% (1)	55
SERC	**66.0% (33)**	22.0% (11)	8.0% (4)	2.0% (1)	2.0% (1)	0.0% (0)	50
SPP	**48.2% (27)**	33.9% (19)	7.1% (4)	7.1% (4)	1.8% (1)	1.8% (1)	56
TRE	**74.4% (32)**	16.3% (7)	4.7% (2)	4.7% (2)	0.0% (0)	0.0% (0)	43
WECC	**40.0% (28)**	25.7% (18)	20.0% (14)	8.6% (6)	4.3% (3)	1.4% (1)	70
					Comments and recommendations:		39
						answered question	**127**
						skipped question	**15**

ERO Survey - Compliance
Question 14



ERO Survey - Compliance
Question 14



	Comments and recommendations:
1	1) Notice of the audit is more than adequate. 2) Notice of information required is much less than adequate.
2	Although SPP concurs with the IRC Standards Review Committee's response on compliance audits, we are concerned about NERC's notifications for compliance investigations. NERC has not made clear what standards are under investigation and what information is requested for compliance investigations. NERC should provide this at the time a registered entity is notified. This not only prepares the entity, it ensures due diligence on NERC's part that there is indeed a need to open an investigation.
3	Audit and Self Certification notices should provide at least sixty (60) days notice to enable industry participants to have sufficient time to provide the information and evidence required.
4	Audit schedules for all regions are publicly posted. However, materials are not due to the Registered Entity any more than sixty (60) days before an audit and the pre-audit information is due to the audit team thirty (30) days before the audit. Effectively, this provides only thirty (30) days to complete the audit information. AEP would appreciate receiving the materials one hundred and twenty (120) days, or earlier, in advance of the audit to provide adequate time to comprehensively complete the pre-audit information. The latest version of the Reliability Standards Audit Worksheets (RSAWs) are unclear, which can lead to unnecessary confusion. For example, the questions don't always provide which requirements are intended nor do they indicate what function(s) are applicable. AEP supports consistent audit forms and structure, but the latest RSAWs falls short in their lack of specificity.
5	Comments and recommendations:
6	Compliance audits are scheduled by Regions. SERC does an excellent job of providing reasonable notice of compliance audits and related information. Limited experience in RFC.
7	Dominion is a member of 4 NERC Regions. Within the last two years several Dominion entities underwent compliance audits in three different regions. Each region had different notice of compliance audits. There does not appear to be a process to ensure regional consistency. NERC should encourage consistency of audit focus and processes both within and between regions
8	During the audit they requested information without reasonable notice and certain documentation was not actually required by the standard.
9	For the 2008 off-site DP audits, WECC did not follow their own procedure for audit notification. No information was provided prior to the beginning of the audit calendar year other than that an entity was going to be audited during that year. Guidance as to what material would be required was more or less nonexistent.
10	Frame of reference is just Spot Audits, since on-site audit will not happen until mid-2009.
11	FRCC has done a good job of improving the communication regarding required information over the past year based on feedback from audited entities.
12	I think they do. I have been notified of my upcomming off-site audit. I have not yet received a notice of what i need to provide but I am not expecting that until late spring or early summer.
13	My first NERC audit id this summer.
14	NERC Notices of compliance audits are a function of the Regional Entity so this will not directly apply to NERC. NERC as the ERO should ensure there are consistent notification times for all entities across all the regions performing compliance audits.
15	NERC The IESO agrees that the regional entity responsible for compliance provides timely notices regarding various audit timelines including specific information that will be required before and during the audit process. However, there are quite a number of RSAWs which stipulate evidence requirements that go well beyond what's needed to demonstrate compliance with requirements. Many of them in fact contain or reflect "requirements" that are not written in the standards. These RSAWs would need to be revised. NPCC See above
16	NERC – We have no direct experience yet with NERC compliance audits. RFC -The answer is yes in terms of notice. However, the answer is in no terms of required information. What information actually is needed to demonstrate compliance is lacking.
17	NERC needs to have a longer transition period for new Reliability Standard Audit Worksheets and Questionairres to become effective.
18	No Comment

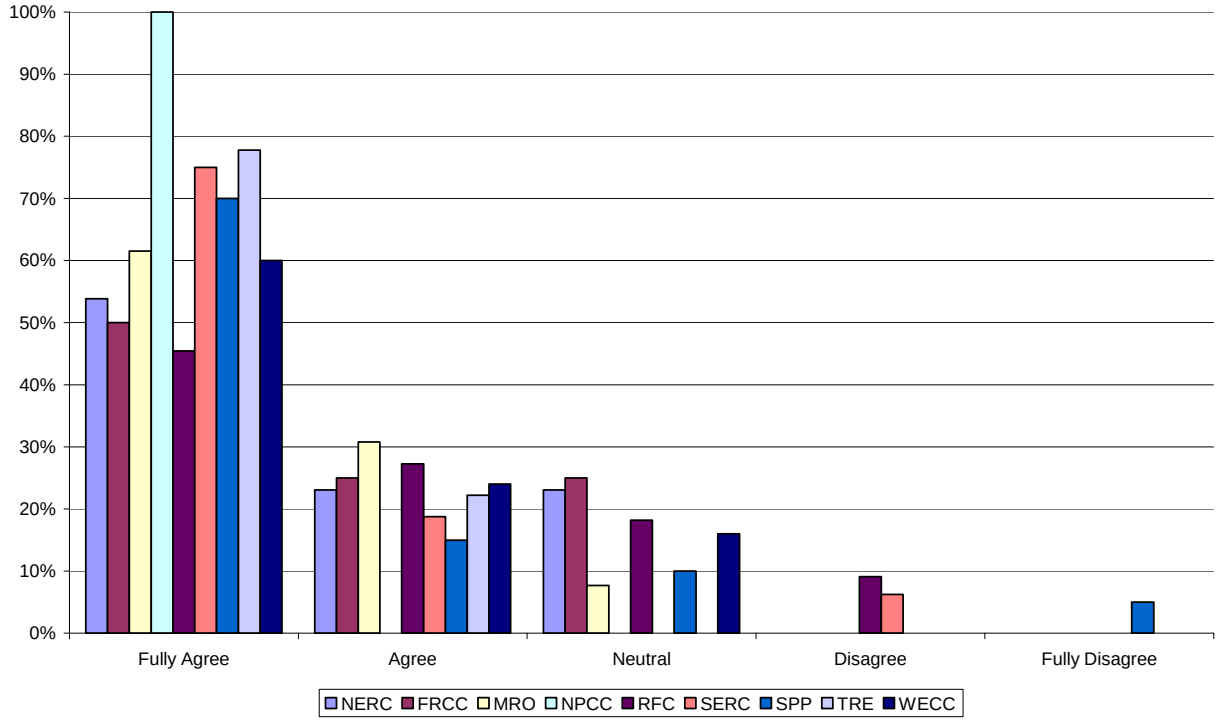
	Comments and recommendations:
19	None
20	Notices of self-assessments frequently change without allowing appropriate time for processing the self-assessment submittals.
21	On our recent audit and others we have been involved in it was very clear that the auditors had not prepared or reviewed the material before the audit. The auditors also requested material that had already been provided and reviewed with them.
22	Our experience with the audit process showed that the WECC was very prompt with its notices regarding the upcoming audit and the required information that was to be provided.
23	Our last audit took place during the period when tools were still under development. So, we don't have a good, firsthand knowledge. For our 2008 audit, worksheets were late and not complete. It made it hard to comply with necessary preparations but in general the answer is yes. The utilities who had their audit dates changed on short notices were possibly unduly burdened. Hopefully that will not happen in 2010. Our final audit results and rsponses to some of our mitigation plans were not provided in a timely manner.
24	RFC provided ample time for review and preparation of the Compliance Audit. Not applicable to NERC
25	See previous comment #2
26	SERC and not NERC notfied us of our compliance audit and the required audit process.
27	Since the Regional Entities are the principal schedulers of Compliance Audits, this question does not appear to be applicable to NERC.
28	Since the Regions are the principal schedulers of Compliance Audits, this question does not appear to be applicable to NERC.
29	Since the Regions are the principal schedulers of Compliance Audits, this question does not appear to be applicable to NERC. Exelon notes that the Regions are following the Rules of Procedure regarding provision of reasonable notice of compliance audits and that noticeable improvement occurred in 2008.
30	SPP gave acceptable advance notice of the compliance audit schedule. SPP also provided a complete audit packet with letter detailing audit scope, requirements, expectations and timeline.
31	SPP send sufficiently and timely notices for compliance actions.
32	The WECC audit notice should identify by number and name the standards that are in the initial audit scope, rather than referencing lists of actively monitored standards that may be applicable to an entity's registered functions.
33	The WECC Web Portal has had errors in the past which have impacted our year-end Self-Certification. Such errors should be resolved before Self-Certification Notices are issued.
34	There is general uncertainty among registered entities on the type and extent of information required to satisfy "Quality of Evidence" expectations. Recent quidance from RFC and, most recently, on the new RE Common Website has helped, but specific minimum expected evidence needs to be listed in the RSAW. Also, it is our understanding some reference documents listed in the RSAWs are going beyond what is required in the actual standard.
35	This is an area were the Regional Entities are doing a consistently good job.
36	Timely return of calls etc is poor WECC - APS was the first to be audited and WECC changed their expectations during their audit.
37	We believe there are quite a number of RSAWs that are technically deficient and also some which stipulate evidence requirements that go well beyond what's needed to demonstrate compliance with requirements. Many of them in fact contain or reflect "requirements" that are not written in the standards. There should be transparency of acceptable levels of compliance. The NERC CCC asked that a disclaimer be put on RSAWs, noting that they are "one way" to demonstrate compliance. This has not occurred. Recommendation 1 - NERC should develop a case history of appropriate evidence to maintain compliance. Currently, it seems solid evidence is described as what people were fined for not having. Recommendation 2 - NERC should make the auditor training available to the industry. Sharing the expectations that auditors are trained to look for in audit will help entities prepare.
38	We can use a longer period than the 60 days given. Althoug we ned to be ready all the time, the preperation for an on site audit is special and longer period is appreciated. I likes the idea of focusing on the 40 or 50 standards every year instead of all. Yes we should be in compliance at all time. But the focus in 1/2 of the standards every year give a special attention and focus.

	Comments and recommendations:
39	We cannot offer comment until we are subject to a compliance audit.
40	We have the following issues with the new NERC RSAWs: • The standard title and number is not located on the front page (cover) of the RSAW. RSAWs will be used in file systems and audits and needs a title that reflects the NERC standard name and number. • Page numbers and possible paragraph numbers should be added. RSAWs will be used in file systems and audits and needs to be easily referenced. • The newly developed questions that replaced the standard requirements are not consistent with the original requirements. An example- BAL-005-0b has 17 requirements that are condensed into 6 questions. • The questions do not follow the order of the BAL-005-0b standards requirements • The questions do not allow for explicit responses to each requirement. We believe the requirements with a response box should be included in the "blue" registered entity section. • Some of the questions are very confusing and appear to exceed the standard requirements • In some cases the questions are beneficial in clarifying a requirement. One case is where a requirement requires the registered entity to act if another entity makes a request. • The RSAWs are extremely large documents, some over 60 pages long for one standard. Condensing them would be helpful. • Signing and notarizing every RSAW will be laborious and non-value added. An approval sheet that aggregates the RSAW approvals should be developed to condense this process (we understand this is being addressed) • The text windows are a welcome addition, however they provide little benefit unless the rest of the RSAW is protected

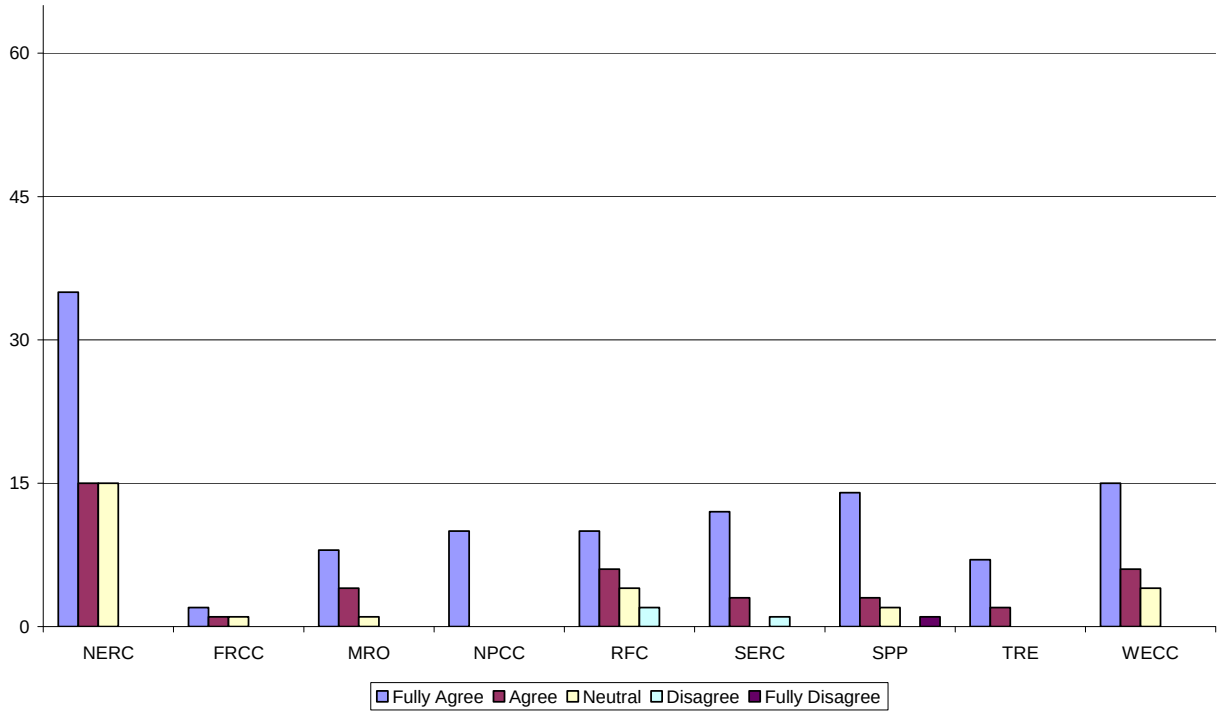
15. Staff conducts the audit in a professional, thorough, and efficient manner.

	NA – Not applicable or have no opinion	1 – Fully agree	2	3 – Neutral	4	5 – Fully Disagree	Response Count
NERC	**42.5% (48)**	31.0% (35)	13.3% (15)	13.3% (15)	0.0% (0)	0.0% (0)	113
FRCC	**90.7% (39)**	4.7% (2)	2.3% (1)	2.3% (1)	0.0% (0)	0.0% (0)	43
MRO	**74.0% (37)**	16.0% (8)	8.0% (4)	2.0% (1)	0.0% (0)	0.0% (0)	50
NPCC	**78.7% (37)**	21.3% (10)	0.0% (0)	0.0% (0)	0.0% (0)	0.0% (0)	47
RFC	**61.4% (35)**	17.5% (10)	10.5% (6)	7.0% (4)	3.5% (2)	0.0% (0)	57
SERC	**69.2% (36)**	23.1% (12)	5.8% (3)	0.0% (0)	1.9% (1)	0.0% (0)	52
SPP	**64.9% (37)**	24.6% (14)	5.3% (3)	3.5% (2)	0.0% (0)	1.8% (1)	57
TRE	**79.1% (34)**	16.3% (7)	4.7% (2)	0.0% (0)	0.0% (0)	0.0% (0)	43
WECC	**65.3% (47)**	20.8% (15)	8.3% (6)	5.6% (4)	0.0% (0)	0.0% (0)	72
						Comments and recommendations:	46
						answered question	**126**
						skipped question	**16**

ERO Survey - Compliance
Question 15



ERO Survey - Compliance
Question 15



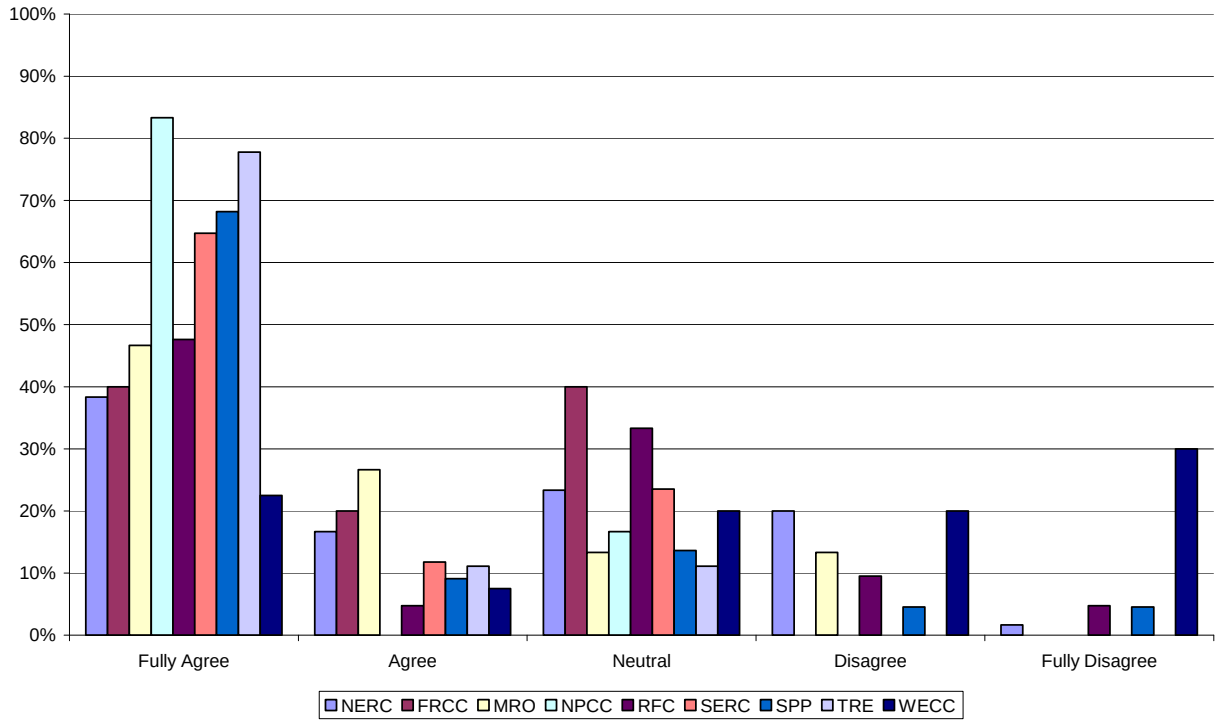
	Comments and recommendations:
1	1) Thourough, efficient yes, sufficient time no. There were more standards scheduled to be audited than could possibly have been thoroughly addressed.
2	1. The value of NERC staff to the audit process is not clear. 2. FRCC staff are professional and thorough. Continued work on efficiency of the process is desirable.
3	APS was the first to be audited and WECC changed the expectations during the audit. This was not fair nor professionals.
4	ATC's audit conducted in late 2007. which was lead by MRO and supported by RFC and NERC, was conducted in a very professional, thorough and efficient manner.
5	Audit staff has performed exceptionally well. Their interactions with AEP have been professional and audits have been conducted in an ethical manner. We are concerned about the lack of support necessary top assure consistency across regions.
6	Audits need to be more consistent. Reviews of audits show at times there is an overemphasis on literal word evaluations and RSAWs versus objectively examining evidence or alternative evidence demonstrations against standards. The compliance audit practices do not appear to be institutionalized in procedures, nor are they consistent from region to region or from audit to audit. The Regional Entities should have uniform training, policies, procedures and criteria in place, consistent with the expectations for the utilities being audited for compliance with standards. Although NERC has provided Reliability Standard Audit Worksheets available for many of the Standards, they are poorly written, require interpretation, and lack the specificity necessary for a compliance audit. The inconsistency in audit practices include, but are not limited to: • Timing and type of documentation requests • Need to 'prove the negative' • Quantity and level of detail in evidence accepted • Alternative evidence presentations, and • Interpretation of specific requirements. NERC and the Regional Entities need to develop and work to a common set of auditing training and procedures that are consistently implemented across all regions. These procedures should address all aspects of the compliance audit process, from preparing for an audit (such as pre-audit documentation requests) through the final step of controlling and properly disposing of evidence documents at the required time after an audit.
7	Based upon limited Spot Audit interaction only.
8	Both NERC and WECC personnel were very professional during our off-site audit.
9	BPA has found that the manner in which WECC/NERC performed our recent on-site audit was neither thorough nor efficient. The on-site review team did not have time to review several of the standards during the on-site portion of the audit, as required. They also have not followed through in completing this work in a professional and efficient manner.
10	EEI understands that, for the most part, the industry reports that the NERC observers have conducted themselves professionally in the Compliance Audits. NERC should encourage consistency of audit focus and processes both within and between regions. There is a general feeling that the audit outcomes are still dependent on the particular auditors that are assigned.
11	For the most part, the industry reports that the NERC observers have conducted themselves professionally in the Compliance Audits. NERC should encourage consistency of audit focus and processes both within and between regions. There is a general feeling that the audit outcomes are still dependent on the particular auditors that are assigned. Exelon feels that the participation of Regional Senior Management in Audits is a good idea. Also, SERC's use of the compliance portal for pre-audit information submission is a best practice.
12	Inconsistancy between teams in Compliance Audit. Some standards were evaluated word-by-word, while others were evaluated on the intent and measurement of the standards. Preliminary evaluation was fair and supported by facts. Not applicable to NERC
13	Insufficient information to make general representations, although FRCC, SERC and MRO staff have received positive comments, while WECC staff has been slow to respond to inquiries - which may indicate more about process overload that profewsionalism. In general, members have commented that on site audits are time consuming for all involved and discussions with neighboring utilities indicate that audits orf small entities can take nearly as long as for much larger entities performing the same functions. Is this efficient?
14	My audit is still upcoming.

	Comments and recommendations:
15	NERC 1. Recommendation 1- NERC should develop a companion database to the standards that link the requirements, measures, and RSAW information. 2. Recommendation 2 – NERC should ensure that audits do not end up becoming merely documentation exercises. Emphasis should be placed on the singular piece of evidence required to meet the requirement rather than multiple pieces of supporting corroborating documentation. Importance of operational examples should be stressed during audits. . 3. Regional entities have to retain audit information on the audits performed on entities. NERC should ensure the confidentiality of this information. NPCC The IESO has had both off-site and a comprehensive on-site audit conducted by NPCC. The IESO found that NPCC and the audit staff which NPCC hires conduct the audits in a professional, thorough, efficient and effective manner.
16	NERC NERC participants on the compliance audit teams are generally very professional and thorough. During the course of the audits, NERC personnel provide inter-regional consistency and focus toward sound compliance audit practices. There are some inconsistencies with this general experience however. At times, NERC personnel can have inconsistent treatments of interpretation of standards between audits. Entities that share compliance experiences often discuss that the same set of circumstances and documentation presented to one audit team was not compliant with another audit team. NERC should strengthen consistency within the compliance audits using the NERC team members to provide clear guidance and direction. Also, delays during site audits occur due to team member disagreements over standard interpretations. NERC should consider implementing a NERC hotline or audit team FAQs info site that audit teams could reference in order to provide more overall consistency and efficiency.
17	NERC observers conduct themselves professionally and in an efficient manner in the audits. SERC staff conducts themselves professionally and in an efficient manner throughout the audit process.
18	NERC Q4: NERC should monitor and calibrate the audit focus and processes within each region and among the regions to ensure consistency.
19	No audit has been completed yet by either SPP or NERC other than self-certifications.
20	No audit to date
21	No audits since the Standards became mandatory. Previous audits and evaluations have gone well.
22	none performed yet
23	Not Applicable
24	Not Applicable - Lompoc has not been audited as yet. We are scheduled for a table-top audit in November 2009.
25	Only SERC staff conducted our audit.
26	Our audit date is TBD, and is tentatively scheduled for 4th Quarter 2009
27	Our audit was done well. No complaints. It would be nice if the results could be shard as the audit progresses, rather than sprung upon us at the exit interview. Especially if compliance violations will be alleged. It would be nice to prepare people, rather than felling blindsided. Tacoma Power felt that there were some knowledge issues in our first audit but expect them to be corrected by the 2010 audit. It appeared that there was a last minute scramble for volunteers to perform the audit which resulted in auditors with little utility experience doing the work. Those that were industry experts were very professional.
28	Our compliance audit will not be held until this spring.
29	Our experience with the individuals has been extremely positive.
30	OUR ON-SITE AUDITOR WAS VERY PROFESSIONAL AND ORGANIZED
31	Platte River Power Authority has not had an on-site audit to date.
32	Recommendation 1- NERC should develop a companion database to the standards that link the requirements, measures, and RSAW information. Recommendation 2 – NERC should ensure that audits do not end up becoming merely documentation exercises. Stress should be on proving compliance with the requirement as opposed providing to multiple pieces of weak evidences or documentation. Importance of operational examples should be stressed during audits. Regional entities have to retain audit information on the audits performed on entities. NERC should ensure the confidentiality of this information.
33	RFC STAFF IS AND HAS BEEN VERY HELPFULL

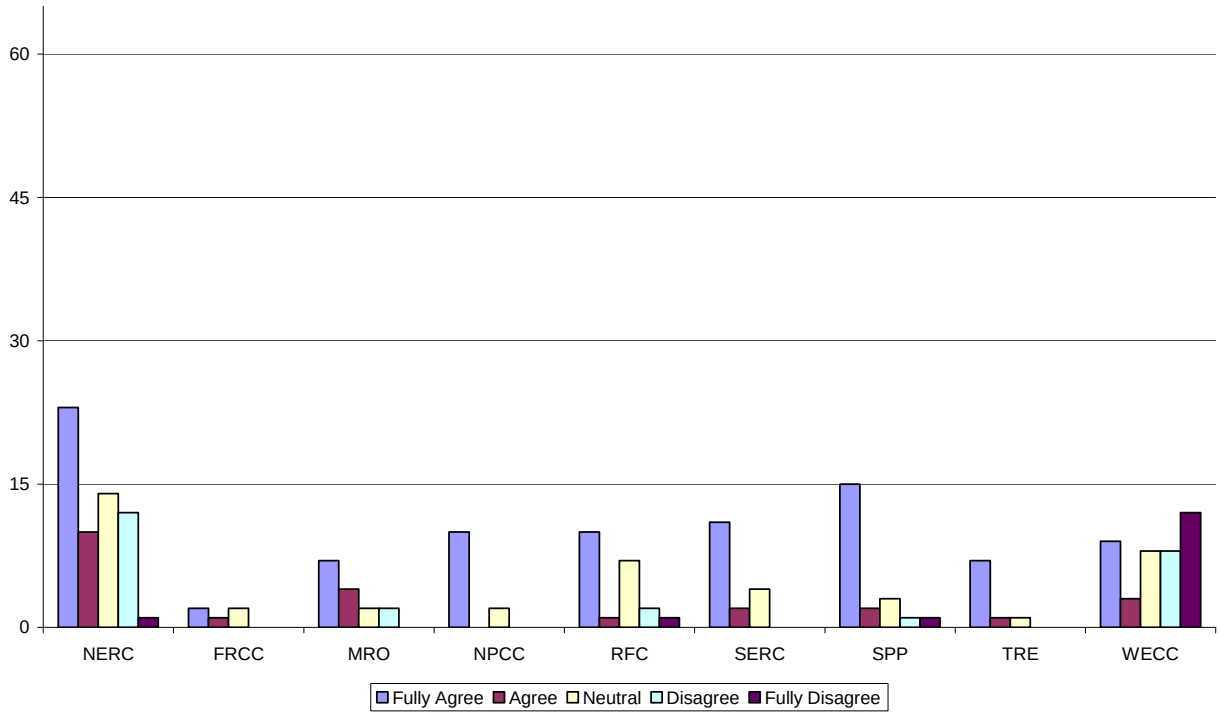
	Comments and recommendations:
34	SERC is to be commended for being only one of two Regions that incorporate SERC member volunteers in performing reliability audits. This not only brings industry expertise to the audit team, but allows the volunteers to take auditing “best practices” back to their company which will enhance the overall quality of compliance.
35	SPP is a party to the IRC Standards Review Comments, please refer to that submittal for our response to this question.
36	Staff conducts is very professional.
37	Staff were very helpful, efficient, thorough and professional.
38	The Audit staff was professional throughout the process. At a regional level the audit staff did not appear to have reviewed much of the material requested, and did not appear to ever review the QRSAWs. Gathering evidence, filling out QRSAWs and transmitting the material in an orderly fashion represents a significant time investment by entities that is not of use in their internal operation or in the maintenance of compliance materials. If the auditors are not using this material then they should not be requesting it.
39	The audit teams have been very professional and thorough. Early audit experience indicates that improvements to efficiency could be gained by a better understanding on behalf of the staffs and the registered entities of what evidence or documentation is sufficient to establish compliance.
40	The contractor made unprofessional comments. In addition, the Audit Team requested new follow-up information after the Exit Briefing was held.
41	The site audit is not until July 2009. The staff is very professional and through when contacted regarding questions.
42	This rating is based on experience with Spot Check Audits.
43	Very professional audit team for our May 2008 Audit.
44	We cannot offer comment until we are subject to a compliance audit.
45	We haven't gone through an audit yet.
46	WECC was extremely professional and courteous during the on-site compliance audit. We felt that all of the team members were efficient and professional.

16. Provides timely feedback and reports to responsible entities, including prompt identification of possible violations of reliability standards.							
	NA – Not applicable or have no opinion	1 – Fully agree	2	3 – Neutral	4	5 – Fully Disagree	Response Count
NERC	**45.9% (51)**	20.7% (23)	9.0% (10)	12.6% (14)	10.8% (12)	0.9% (1)	111
FRCC	**88.1% (37)**	4.8% (2)	2.4% (1)	4.8% (2)	0.0% (0)	0.0% (0)	42
MRO	**70.6% (36)**	13.7% (7)	7.8% (4)	3.9% (2)	3.9% (2)	0.0% (0)	51
NPCC	**73.9% (34)**	21.7% (10)	0.0% (0)	4.3% (2)	0.0% (0)	0.0% (0)	46
RFC	**61.1% (33)**	18.5% (10)	1.9% (1)	13.0% (7)	3.7% (2)	1.9% (1)	54
SERC	**67.3% (35)**	21.2% (11)	3.8% (2)	7.7% (4)	0.0% (0)	0.0% (0)	52
SPP	**61.4% (35)**	26.3% (15)	3.5% (2)	5.3% (3)	1.8% (1)	1.8% (1)	57
TRE	**79.1% (34)**	16.3% (7)	2.3% (1)	2.3% (1)	0.0% (0)	0.0% (0)	43
WECC	**43.7% (31)**	12.7% (9)	4.2% (3)	11.3% (8)	11.3% (8)	16.9% (12)	71
					Comments and recommendations:		42
						answered question	**126**
						skipped question	**16**

ERO Survey - Compliance
Question 16



ERO Survey - Compliance
Question 16



	Comments and recommendations:
1	1) Initial reports are timely. 2) Everything after initial is woefully untimely.
2	A preliminary notice of possible violation in Oct 2007 has yet to move through alleged violation or retraction stage.
3	APS is still waiting to hear from WECC on three mitigations that were submitted in June 2007 in response to audit findings.
4	Communications of all types have been consistently provided from the REs in a timely manner.
5	FRCC is a little inconsistent in this regard. They do give immediate feedback on the results of an audit, although the generation of the final audit report was extremely slow. Our recent self-report submittals were responded to in a timely manner.
6	It appears that compliance violation investigations (CVIs) following system events take too long. Also, there is a total lack of transparency in the way these CVIs are conducted. During the CVI, if it is established that in all likelihood, an entity has violated a particular standard following an event, the first priority should be to inform the applicable entity about the standard violation. This would help the entity to perform an internal review to ensure reliability does not remain at risk. Additionally, there should be additional information available to the industry on a periodic basis as to what happened, why it happened etc. before a formal report is developed. It appears that NERC has taken the position that any system event must have an underlying set of compliance violations. There are events that happen (especially related to storm activity, natural disasters) that are NOT compliance issues. Responding to a CVI will just delay implementation of event analysis and recommendations (if possible) to avoid similar events in the future. Additionally, it is important that NERC and the regional entities ensure confidentiality of information and appropriate reporting mechanisms during cross-border CVIs due to different jurisdictional authorities.
7	It has reportedly taken WECC upwards of a year to issue Notices of Alleged Violations related to violations that have been self-reported or discovered by WECC through compliance audits. With respect to submitted mitigation plans, WECC has not provided timely feedback. Mitigation plans are often brought to completion by a registered entity long before WECC informs the registered entity if the plans have been accepted.
8	It has taken over 6 months to receive a response that a completed mitigation plan was accepted or confirmed compliant by WECC. In one instance, none of the Districts compliance contacts received an email regarding a completed mitigation plan that WECC claims to have sent.
9	It took WECC at least 6 months to provide a response to our Spot Check. The FRCC was a little quicker and requested more evidence. I believe the FRCC did a wonderful job at keeping us informed of the process and where we stood as a registered entity.
10	It was quite a while before we received our audit report from WECC.
11	NERC Feedback and reports on potential violations are a function of the Regional Entity so this will not directly apply to NERC. NERC as the ERO should ensure that Regional Entities are providing efficient and timely responses for audit reports, potential violations to standards and interpretations of standards.
12	NERC Regional entities provide timely feedback and reports including prompt identification of possible violations of reliability standards during audits. However, it appears that compliance violation investigations (CVIs) following system events take too long. Also, there is a lack of transparency in the way these CVIs are conducted. If the review of evidence during a CVI strongly suggests that an entity has violated a particular standard following an event, the first priority should be to inform the applicable entity about the potential standard violation. This would help the entity to perform an internal review to ensure reliability does not remain at risk. Further, additional information should be made available to the industry on a periodic basis summarizing established facts of the investigation, before a formal report is developed. Additionally, it is important that NERC and the regional entities ensure confidentiality of information and appropriate reporting mechanisms during cross-border CVIs due to different jurisdictional authorities. In the absence of an inter-governmental agreement authorizing cross-border investigations NERC should refrain from releasing confidential information to FERC without the approval of the appropriate governmental authority. NPCC NPCC provides timely feedback and reports to responsible entities including prompt identification of possible violations of reliability standards.
13	NERC and the regional entity are keenly aware of the existing backlong and are working on a strategy to resolve the issue.
14	NERC/RFC: Q5: NERC and the regional entity are keenly aware of the existing backlog and are working on a strategy to resolve the issue.
15	No audit to date

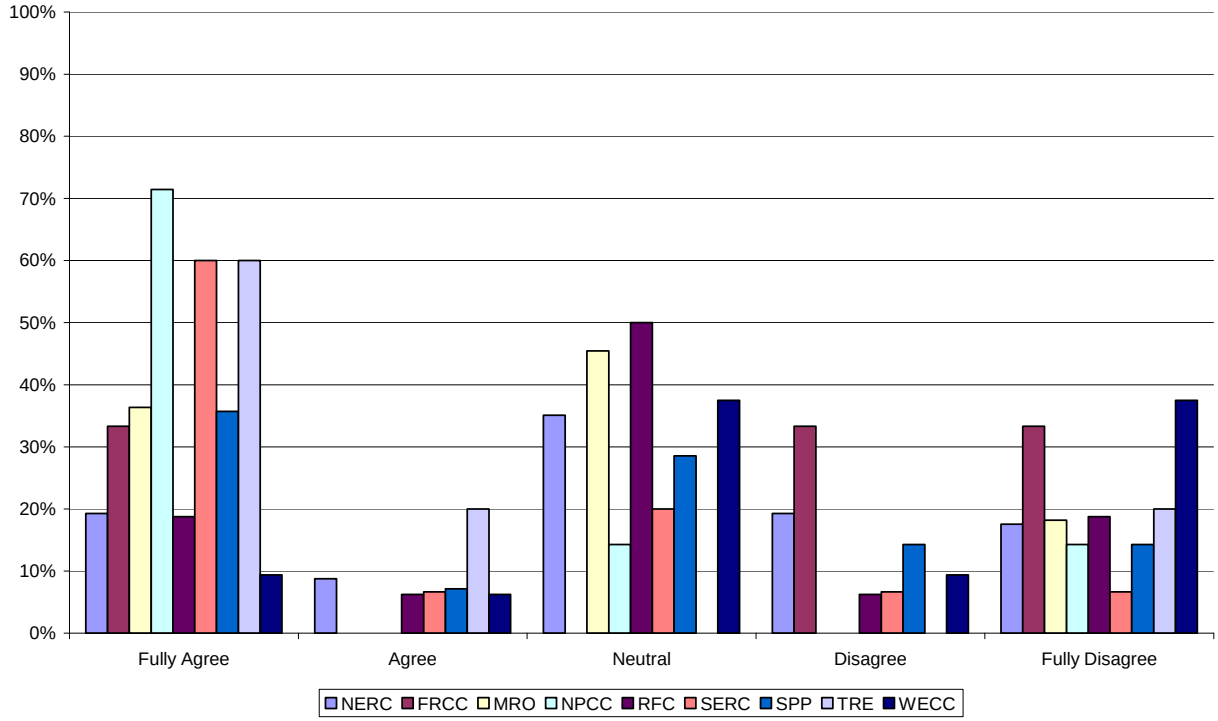
	Comments and recommendations:
16	No Comment
17	No violations
18	None performed
19	Not Applicable - See comment under 3-4 above.
20	Not applicable to NERC NPSCO has recieved feedback and preliminary reports withing the schedule that was provided at its Compliance Audit
21	NPCC quickly and efficiently processed a Self Reported Violation. WECC has never processed any of our Self Reported Violations over the course of a year and a half.
22	Official reports can take up to 6 months or more to receive; far in excess of the expected timelines.
23	Our experience is that feedback and reporting on audits and possible violations has not happened timely. The formal interpretation process typically takes in excess of six months. Clarification and attempts to obtain responses from WECC on various issues has been almost non-existent. Instances of 6 and 7 phone calls to the same person, went unreturned until their supervisor was involved. Many mail boxes are over their size limit for multiple days so that you are not even able to leave a message. This severely restricts the ability of registered entities to obtain timely feedback and guidance. It is our understanding that WECC is attempting to stay current with the 2009 audit process; however, addressing the backlog from 2007 to 2008 is critical for those registered entities with audits and other issues still pending from that time. A recent improvement has been seen in the processing of mitigation plan submittals; however, prior to 2009, this process did not provide entities with any assurances that the mitigation plan submittals were being reviewed and accepted. If there were any issues with a mitigation plan, the plan would likely be completed before an issue could even be addressed. Registered entities are held to strict deadlines, however, WECC has consistently failed to meet their own deadlines and respond in a timely fashion to enable registered entities to proceed. The Registered Entities are not only held to published deadlines, but are denied the ability to even submit a late response because WECC disables the Web Portal from accepting late submittals
24	Please see SPP's comment to Question #3 above.
25	PPL's first audit (RFC) since June 2007 is scheduled to begin February 24, 2009.
26	RFC-The process time between self reports and feedback on self reports is a little slow. However, it is important to take the time to determine whether an entity is really in violation or not. There is a tension between the time required to determine whether a self-reported potential violation is an actual violation and the timing of submittal and approval of a mitigation plan because penalties for violation can be assessed daily until a mitigation plan for a violation has been accepted. Since it is inefficient to spend resources developing a mitigation plan if there is no violation, a quick but accurate resolution of the status of a potential violation is important. This process needs to give entities an incentive to focus on identifying and correcting non-compliance with reliability standards that could have a material impact on the reliability of the bulk power system rather than on avoidance of monetary penalties.
27	See comments above. Insufficent information to comment on regions other than WECC. Violations may be identified promptly, but they are not resolved (dismissed ormoved forward to the next process state) until months later.
28	SPP and NERC provided timely information regarding compliance reports and possible violations. They were open to submission and review of new or additional supporting information during the actual audit process. This flexibility enhanced the efficiency of the audit process.
29	Still waiting on the WECC
30	The feedback and reports are the responsibility of the Regions and not NERC. SERC provides timely feedback and reports to responsible entities.
31	The first year has seen some delays in the provision of feedback to Registered Entities, which is understandable given the numerous entities which must comply with the NERC standards and requirements. However, timely feedback is of utmost importance to responsible entities and, if possible, NERC and Regional Entities should strive to provide this feedback and/or reports to Registered Entities as soon as possible.
32	The MRO has provided prompt feedback on any self-report of possible violations. With regards to other discovery methods, we cannot offer comment until we have experience.

	Comments and recommendations:
33	The process from initiation to closure is taking many months, with most of the delay being on the Audit staff side. At a regional level the FRCC is addressing this aggressively with expanded staff and improved procedures.
34	The Regional Entities have effectively administered the processes and generally met the time lines defined in their compliance monitoring and enforcement policies and procedures.
35	There is a backlog on reporting that has bogged down the reporting process and stopped spot-checks, so feedback is at a minimum.
36	This question is Not Applicable to NERC as feedback and reports are the responsibility of the Regional Entities.
37	This question is Not Applicable to NERC as feedback and reports are the responsibility of the Regions. Exelon feels that there is room for process improvement by the Regions with regards to timely feedback and formal response to self-certifications and spot-check submittals. In many cases, there is no formal acceptance or acknowledgement of receipt by the Regions following information submittals.
38	This reflects WECC's past performance from June 18, 2007, to date. WECC's ongoing efforts to make its process more responsive and timely are appreciated.
39	Time response between filed notices of self-report, mitigation or mitigation completion are way too long.
40	WECC has struggle with a staffing vs. workload issue so their timeliness has not been good. We understand but look for better timeliness as WECC adds staff. It would be nicer if the audit teams would share the preliminary findings and results. Basically, have an audit exit brief/debrief.
41	WECC has thus far done a poor job of meeting schedules and providing feedback on possible violations. This is attributed to the immense backlog of compliance matters in the WECC Compliance Department.
42	Yes

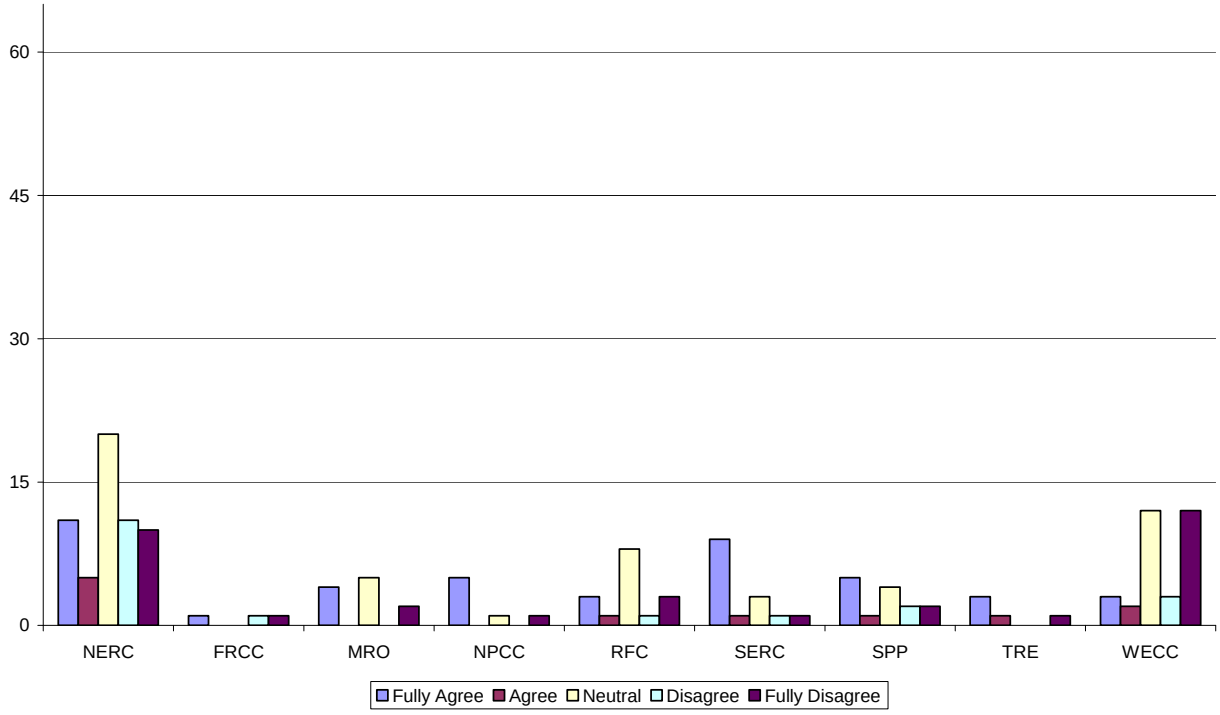
17. Processes violations to a final state in a timely manner.

	NA – Not applicable or have no opinion	1 – Fully agree	2	3 – Neutral	4	5 – Fully Disagree	Response Count
NERC	**50.0% (57)**	9.6% (11)	4.4% (5)	17.5% (20)	9.6% (11)	8.8% (10)	114
FRCC	**93.0% (40)**	2.3% (1)	0.0% (0)	0.0% (0)	2.3% (1)	2.3% (1)	43
MRO	**78.4% (40)**	7.8% (4)	0.0% (0)	9.8% (5)	0.0% (0)	3.9% (2)	51
NPCC	**84.4% (38)**	11.1% (5)	0.0% (0)	2.2% (1)	0.0% (0)	2.2% (1)	45
RFC	**71.4% (40)**	5.4% (3)	1.8% (1)	14.3% (8)	1.8% (1)	5.4% (3)	56
SERC	**71.7% (38)**	17.0% (9)	1.9% (1)	5.7% (3)	1.9% (1)	1.9% (1)	53
SPP	**75.0% (42)**	8.9% (5)	1.8% (1)	7.1% (4)	3.6% (2)	3.6% (2)	56
TRE	**88.1% (37)**	7.1% (3)	2.4% (1)	0.0% (0)	0.0% (0)	2.4% (1)	42
WECC	**56.2% (41)**	4.1% (3)	2.7% (2)	16.4% (12)	4.1% (3)	16.4% (12)	73
					Comments and recommendations:		44
						answered question	**126**
						skipped question	**16**

ERO Survey - Compliance
Question 17



ERO Survey - Compliance
Question 17



	Comments and recommendations:
1	1. Things seem to be rear thinking with past documentation being revisited as knowledge is gained. Thus a "final state" matter could be reopened.
2	A simplified, abbreviated process is needed for resolution of a self-reported or self-certified noncompliance. This simplified, abbreviated process needs to include provisions for simultaneous resolution of a noncompliance with all Regional Entities within which the Registered Entity operates, if applicable.
3	Alleged violations that do not impact the BES should be adressed immediately and within the authority of the RE
4	Although we have no direct experience with this question, we note that there is a very large backlog of reported violations that have not been resolved. Timely completion of the processing of such violations is essential to the credibility of NERC and the REs and important in terms of providing feedback to registered entities about actions and behaviors that are deemed compliant with reliability standards.
5	Although we recognize that this is a time consuming and intensive process, no violations out of FRCC have been processed to a final state to date.
6	BPA finds that NERC and WECC need to improve their ability to respond back to registered entities in a timelier manner, as required to meet their various violations processes.
7	Have heard that the process is very slow, but have no real experience with the process.
8	Haven't even come close to a final state yet and its been what 9 months or so
9	I don't have sufficient knowledge of the current process to evaluate if the time being taken is timely or not. Since the processes are relatively new it will take some time to achieve the expected timeframe. Currently I do believe that the industry needs timely information relative to equipment and system faults observed that could be correctable before a similiar incident occurs at a different registered entity using similar equipment or system design.
10	It is difficulty to discern an appropriate rating as it is too early in the process. So far, there is a rather large backlog of compliance violations with some determinations spanning several months and on-going requests and questioning throughout the term.
11	It is taking a year or longer to post audit findings, this makes it difficult for entities to learn from others.
12	MRO was very effective in processing self-reported violations both before and after the June 18, 2007 mandatory implementation data. However, in general, the industry has not been well served by the large backlog of alleged violations which have not yet been processed to closure. We believe that the backlog is contributed to NERC's lack of leadership on oversee and developing a consistent approach for reviewing, filing and approving possible standards violations.
13	NERC NERC needs to prioritize violations during the processing of these compliance violations. This would help avoid the significant backlog of CVIs which now exists. NERC needs to ensure that violations of “administrative” nature are processed in a timely fashion. In addition, more granularity and objectivity in assigning VRFs and VSLs would reduce settlement time and simplify the due process. NPCC NPCC has done a good job in processing violations in a timely manner according to the NPCC self-assessment report.
14	NERC While NERC successfully put forth a robust process within the original CMEP, it has continued to struggle in implementing the full standards compliance process. Since June of 2007 when mandatory enforceable standards took effect, NERC has successfully filed with FERC 51 individual violations to the standards totaling $583,000 in penalty amount. The resulting backlog of compliance violations simply must be resolved more swiftly in order to reach a steady-state level of compliance activity which will be more manageable by the Regions and NERC. NERC as the ERO must remain responsible for the compliance enforcement due to the technical nature and scope of the reliability standards. The pending backlog is a result of implementation of the mandatory compliance law and must be considered within the start-up timeframe and not indicative of what is expected once a steady state of compliance activity is reached. The industry as a whole is working with the same step change in activity in order to establish and strengthening compliance efforts to meet the compliance requirements. NERC as the ERO continues to work toward the goal of consistent, timely and effective compliance enforcement.

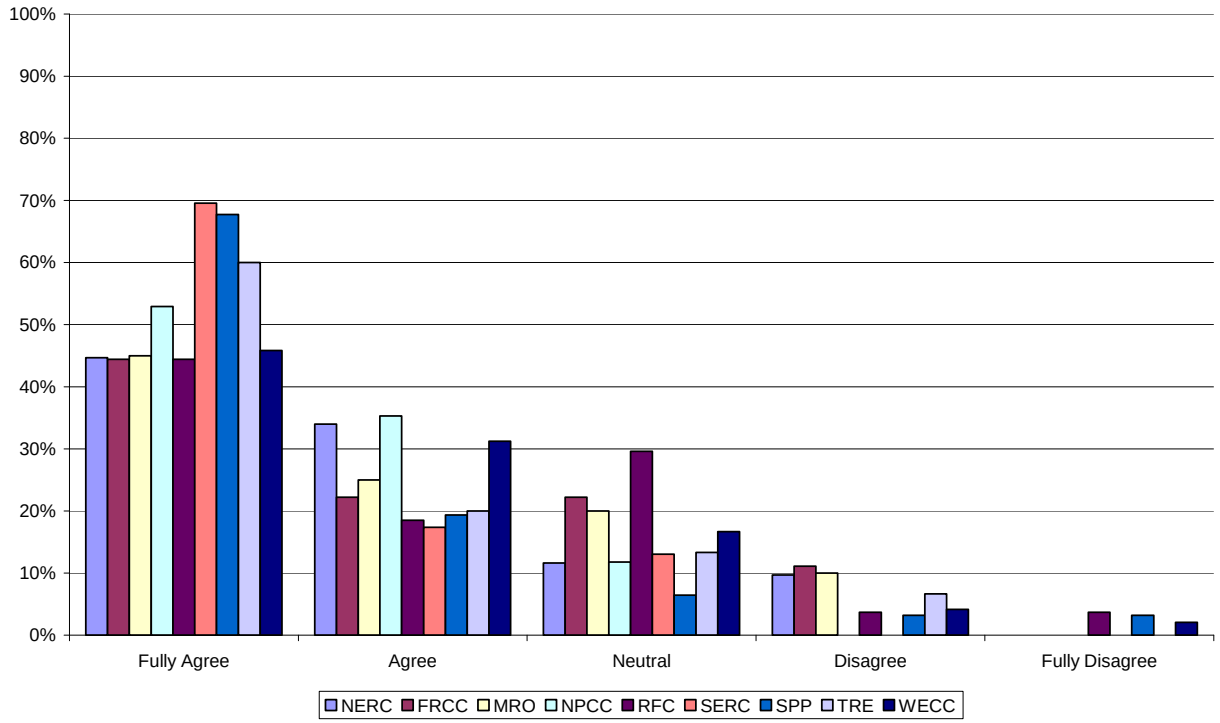
	Comments and recommendations:
15	NERC appears to have become a bottleneck as well, with numerous violations remanded to the regions with insufficient instructions as to the additional information required to submit a completed NOAV or NOP. SERC appears to be alone in fully processing numerous violations to their end states. Other regions have reached the end state for a few violations. WECChas yet to have a NOP filed at FERC.
16	NERC has a heavy backlog and does not appear to be making substantial progress towards resolution. The backlog is in itself a hindrance to reliability improvement as it prevents the industry from incorporating lessons learned into reliability processes. The Violation process appears to be overly burdensome especially for administrative items. Based on our experience, SERC efficiently processes the violations.
17	NERC needs to prioritize violations during the processing of these compliance violations. This would help avoid the significant backlog of CVIs which now exists. NERC needs to ensure that violations of "administrative" nature are processed in a timely fashion. In addition, more granularity and objectivity in assigning VRFs and VSLs would reduce settlement time and simplify the due process. In other words, NERC should create an administrative infraction category that can be dealt with expeditiously. This was suggested in Order No. 693.
18	NERC Sanction Guidelines should offer an expedited process for processing non-serious violations.
19	NERC/RFC: Q6: A case history is lacking due to the violation backlog. A complete and thorough case history will assist all in improving reliability by documenting best practices and lessons learned.
20	NIPSCO has not reached this point in the Compliance Audit process. NIPSCO is aware of the industry concern with the backlog at NERC and the apparent lack of progress addressing this. Faster resolution would facilitate reliability improvements with lessons learned being available and incorporated.
21	No audit to date
22	No comment
23	No violation occurring since June 18, 2007 in WECC's jurisdiction has reached a final state as of February 20, 2009.
24	No violations
25	Not applicable
26	Not applicable. See comment under 3-4 above.
27	NPCC quickly and efficiently processed a Self Reported Violation. WECC has never processed any of our Self Reported Violations over the course of a year and a half.
28	See comments from response to Q5 above.
29	See response to # 5
30	SPP is a party to the IRC Standards Review Comments, please refer to that submittal for our response to this question.
31	Staffing levels at the regional entities has not kept up with reams of data coming from the responsible entities. Many mitigation plans are being approved 6 months or more after submittal. Violations don't reach a public posting stage until 12 or more months after the fact. I expect this to improve when the staffing and processes at the regional entities are in place. Considering how the regional entities are "growing" their programs and trying to meet their compliance monitoring tasks, they are doing a great job.
32	The current and longstanding backlog of potential standards violations is both preventing industry from more completely understanding what it needs to do to fully comply with the standards, and delaying resulting reliability improvements that are central to NERC's role as the ERO. These potential violations need to be prioritized and processed in a timely manner to allow the industry to make improvements and modifications to processes, procedures and tools required for compliance with FERC approved reliability standards that will enhance the reliability of the bulk power system. Perhaps even more important is the development of mechanisms to treat minor infractions (i.e. parking violations) differently from immediate reliability impact (i.e. speeding and reckless driving) violations. In developing this approach to processing violations using the concept of minor violations, it is important that "minor" be defined by the actual impact a violation of a reliability standard requirement has on the reliability of the bulk power system.
33	The process takes a long time. Efforts to streamline the process, as noted on Page 65 of the Preliminary Self Assessment, will be helpful. NERC should consider the NRC's approach to addressing low risk/low severity type violations. The process allows for timely resolution of these type violations without engaging in the entire enforcement process for violations.

	Comments and recommendations:
34	The violation backlog is simply unacceptable and NERC does not appear to be making substantial progress towards resolution. The backlog is in itself a hindrance to reliability improvement as it prevents the industry from incorporating lessons learned into reliability processes. There have been anecdotal reports that NERC is demanding an excessive level of perfection from the Regions. The Violation process is overly burdensome especially for administrative items and seems to be emphasizing form over function. It can be difficult for a company to discern the present status of a particular violation.
35	The violation backlog is simply unacceptable and NERC does not appear to be making substantial progress towards resolution. The backlog is in itself a hindrance to reliability improvement as it prevents the industry from incorporating lessons learned into reliability processes. There have been anecdotal reports that NERC is demanding an excessive level of perfection from the Regions. The Violation process is overly burdensome especially for administrative items and seems to be emphasizing form over function. It can be difficult for an entity to discern the present status of a particular violation.
36	The violation backlog is simply unacceptable and NERC does not appear to be making substantial progress towards resolution. The backlog is in itself a hindrance to reliability improvement as it prevents the industry from incorporating lessons learned into reliability processes. There have been anecdotal reports that NERC is demanding an excessive level of perfection in documentation from the Regions. The Violation process is overly burdensome especially for administrative items and seems to be emphasizing form over function. It can be difficult for an entity to discern the present status of a particular violation.
37	There is a considerable backlog of violations (excluding NPCC region) from the 2007 amnesty period up through 12/31/07. This backlog prevents lessons learned from being shared with the industry.
38	TOO EARLY. WE ARE IN FOR 2 VIOLATIONS AT THIS TIME
39	We have no direct experience with violation processes, but are concerned with the back log and disposition of violations.
40	We have not yet been audited and have not received any violations. Although we have not yet received our audit, information provided by the NERC and the WECC on the backlog indicates that violations are not processed in a timely manner.
41	We haven't had experience in this area.
42	WECC has not been able to process alleged violations and audit findings in a timely fashion. Evidence of this has been seen with the 2008 spot check program as well as our own on-site compliance audit. For the vast majority of alleged violations, we as the accused, have submitted mitigation plans and completion forms for those mitigation plans before WECC even acknowledges the submittal of the mitigation plan itself. This leaves the entities in a state of suspense, and unnecessarily adds confusion and stress to the Registered Entities.
43	WECC has struggle with staffing vs. workload issue, so their timeliness has not been good. We understand but look for better timeliness as WECC adds staff. Two months seems like a long time to process.
44	While SERC is working toward resolving outstanding alleged violations, the backlog of outstanding cases still needs to be resolved. However, when compared to some of the other Regions, SERC has done a relatively impressive job in processing outstanding violations. In addition, SERC is to be commended for its effort with the development of a pilot “short-form” settlement process for lower risk violations. We understand work is ongoing to ensure the process meets FERC’s expectations and that the process is applicable to a sufficient set of violations so as to be effective.

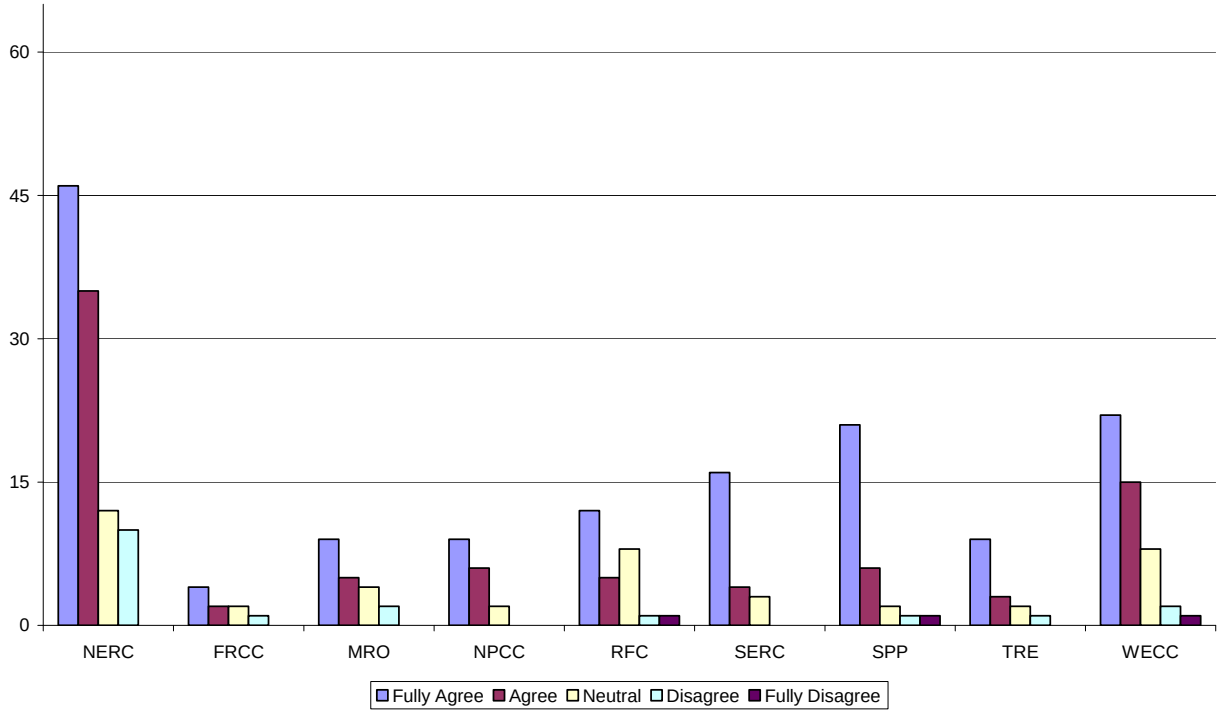
18. Is effective in encouraging registered entities to conduct internal self-assessments of compliance and to self-report possible violations in a timely manner.

	NA – Not applicable or have no opinion	1 – Fully agree	2	3 – Neutral	4	5 – Fully Disagree	Response Count
NERC	6.4% (7)	**41.8% (46)**	31.8% (35)	10.9% (12)	9.1% (10)	0.0% (0)	110
FRCC	**79.1% (34)**	9.3% (4)	4.7% (2)	4.7% (2)	2.3% (1)	0.0% (0)	43
MRO	**60.8% (31)**	17.6% (9)	9.8% (5)	7.8% (4)	3.9% (2)	0.0% (0)	51
NPCC	**63.0% (29)**	19.6% (9)	13.0% (6)	4.3% (2)	0.0% (0)	0.0% (0)	46
RFC	**50.9% (28)**	21.8% (12)	9.1% (5)	14.5% (8)	1.8% (1)	1.8% (1)	55
SERC	**55.8% (29)**	30.8% (16)	7.7% (4)	5.8% (3)	0.0% (0)	0.0% (0)	52
SPP	**45.6% (26)**	36.8% (21)	10.5% (6)	3.5% (2)	1.8% (1)	1.8% (1)	57
TRE	**65.1% (28)**	20.9% (9)	7.0% (3)	4.7% (2)	2.3% (1)	0.0% (0)	43
WECC	**34.2% (25)**	30.1% (22)	20.5% (15)	11.0% (8)	2.7% (2)	1.4% (1)	73
					Comments and recommendations:		31
						answered question	**126**
						skipped question	**16**

ERO Survey - Compliance
Question 18



ERO Survey - Compliance
Question 18



	Comments and recommendations:
1	1. Yes for conducting internal audits. 2. Not effective in encouraging self-reporting. First of all, the mitigation plan system is cumbersome to the point that the entity may be better off concentrating resources on fixing the non-compliance. Secondly, it has been advertised that self-reporting will build good will between the entity and agency, and ultimately benefit the entity, but with so many levels of bureaucracy the violation ends up treated like any other and the incentive to self-report is diminished
2	A simplified, abbreviated process is needed for resolution of a self-reported or self-certified noncompliance. This simplified, abbreviated process needs to include provisions for simultaneous resolution of a noncompliance with all Regional Entities within which the Registered Entity operates, if applicable. Reward self-reporting, self-certification, and self-initiated mitigation by instituting a simplified, abbreviated process for resolution of a noncompliance.
3	Assessments and self-reporting violations has been encouraged and is an important element of the reliability compliance process. However, since a significant number of violations remain to complete the process, the value of self-reporting has not yet become fully evident. AEP would suggest that for self-reported violations that have minimal or no impact on reliability, there should be no fine. Only under repeating situations or high numbers of minimal violations should NERC determine that the compliance culture of the organization is lacking and apply an appropriate fine to facilitate the necessary mitigation.
4	Follow through with more substantial credit for Self Reporting and with penalties for not conducting internal assessments. There's talk about the importance of self-assessment and self-reporting, but the recent NOAV didn't seem to give much credit for the self-reports. Seems contradictory to what is continually communicated.
5	Guidance provided by NERC and the Regional Entities promotes self reporting, but the practical application of reviews, self-certifications, or audits effectively results in strict liability discouraging proactive steps by Registered Entities to enhance reliability. Furthermore, NERC and FERC have changing obligations and requirements to satisfy essential documents, which makes self-reporting practically difficult. Nevertheless, self-reporting is an essential component of a good compliance program because it can provide the industry with "lessons learned" and new mitigation methods. FERC, NERC, and the Regional Entities should encourage self-reporting as a learning opportunity rather than the first step into an uncertain penalty zone. Focus on self-reporting and lessons-learned provides tangible enhancements to reliability, while continuation of focus on enforcement by way of penalties and sanctions with process and conclusion primarily provides challenges. NERC has not clearly explained the consequences of self-reporting, information on its penalty calculation has been withheld, and anecdotal results suggest there are strong disincentives to self-report. Given the lack of demonstrated benefit to self-reporting, there is little apparent incentive for a Registered Entity to risk a fine and the adverse publicity from doing so. If a potential violation is identified and corrected promptly, the benefits of self-reporting should be clearer. A culture of compliance should be based on a culture of excellence, a culture of reliability, and a culture of learning. Self-reporting a possible compliance violation should support all three. NERC should clearly state with protocols and practices why and how self-reporting promotes reliability, and eliminate fines for minor, self reported violations that meet these three criteria: IF the violations are: • Self reported, AND • Have no or minimal reliability impact, AND • Are promptly resolved and not repetitive THEN penalties and sanctions should always be waived. From a financial risk perspective this provides a strong incentive to self report and encourages the desired results of long term continued reliability enhancement. This also has the added effect of simplifying the monitoring program and preventing enforcement process backlogs, thereby making the overall Compliance Monitoring and Enforcement Program more efficient and effective. Penalties and sanctions for violations would still be applied in situations where an aggregate impact such as high reliability impact or numerous repeats indicate lack of an adequate compliance culture, eliminating concern that self-reporting could be used to 'game the system'. NERC should publicly post the enforcement and penalty calculation guidelines so utilities are fully aware of the process, calculation methodology, and value attributed to compliance program elements.

	Comments and recommendations:
6	I have not seen any information from WECC regarding internal self-assessments, and WECC has stated they will not accept any self reports of possible violations from registered entities. The following was taken directly from the WECC 2009 CMEP Implementation Plan: 3 Some Registered Entities have Self Reported "possible" violations while they conduct an internal compliance review to determine if they are compliant or not. These types of Self Reported violations will not be accepted. A Registered Entity should only Self Report non-compliance when they have determined there has been an actual violation of the requirements of a standard. Further, at the last CUG meeting, the message from WECC was that they will not tell a registered entity what is needed to show compliance.
7	JEA supports a compliance environment in which entities can self-report and learn from each other in order to improve entities ability to comply and to improve the reliability of the bulk power system. However, without information sharing regarding the specific nature of violations (lessons learned) and clarity surrounding the nature of penalty assessments there is a distinct lack of a clear incentive for an individual entity and lack of clear benefit to the industry as a whole to develop compliance programs to root out problems and self-report as desired by the regulator.
8	NERC Internal self-assessments and self-reporting of violations have been strongly encouraged on all fronts including NERC and the Regional Entities. Clearly, entities should always notify their Regional Entity when a known violation to a standard occurs. What is difficult to determine is the extent of the effect self-reporting has on the outcome of potential penalties. NERC should focus on the reduction of the violation backlog and make more clear statements when the penalties are levied how self-reporting helped to reduce or eliminate the penalty decision. NERC should also make clearer the impact of first time violations to minor or non-critical standard requirements for those non-penalty based decisions.
9	NERC NERC has conducted a few compliance workshops to encourage registered entities to conduct internal self-assessments of compliance. However, these workshops tend to cover broad areas and are not focused on the topic of compliance. Moreover, these tend to assume a level of expertise for the people attending these workshops which may not be the case especially since the topic, along with all the processes and issues, are still being understood and evaluated by the industry. These workshops need to be built from ground-up so as to make these effective and easily understood by the industry which is still grappling with the issue of compliance, enforcement, audits, and penalties. NPCC NPCC through compliance workshops has been effective in encouraging registered entities to conduct internal self-assessments of compliance and to self-report possible violations in a timely manner.
10	NERC and the Regional Entities have been effective in communicating and encouraging registered entities to self-report potential violations. However, regulator protocols do not appear to sufficiently incent companies to make voluntary self-report. NERC and the Regional Entities need to do a better job in highlighting the self-reported violations and demonstrating how that was taken into consideration when determining the final violation.
11	NERC has conducted a few compliance workshops to encourage registered entities to conduct internal self-assessments of compliance. To date this has been a FERC domain and FERC rulings have helped entities realize that self-reporting would help in reducing penalties. NERC needs to go a step further. For example, if an entity identifies a problem and is up front about reporting it, there should be an expeditious way to treat this. Sanctions should be the exception for self-reported, self-corrected violations that do not impact the BES.
12	NERC has encouraged prompt reporting of vegetation related violation. However, based on the published results of the violations that are processed so far, we have no way of knowing whether appropriate credit for self-reports is being given. In fact, the amount of backlog tends to indicate a disincentive towards self-reporting. NERC should work with FERC and the industry stakeholders to develop a process to ensure that minor violations that are self-reported with acceptable mitigation plans are dealt with on an expedited, non-penalty basis. SERC encourages internal self assessment and self reporting in compliance seminars and other forums. However, the violation process is not transparent to assess what level of credit has been given for self reporting.
13	NERC operator certification and system operator training should be combined. Training should focus more on results than documenation
14	None
15	PPL conducts internal self-assessments and has made self reports when appropriate.

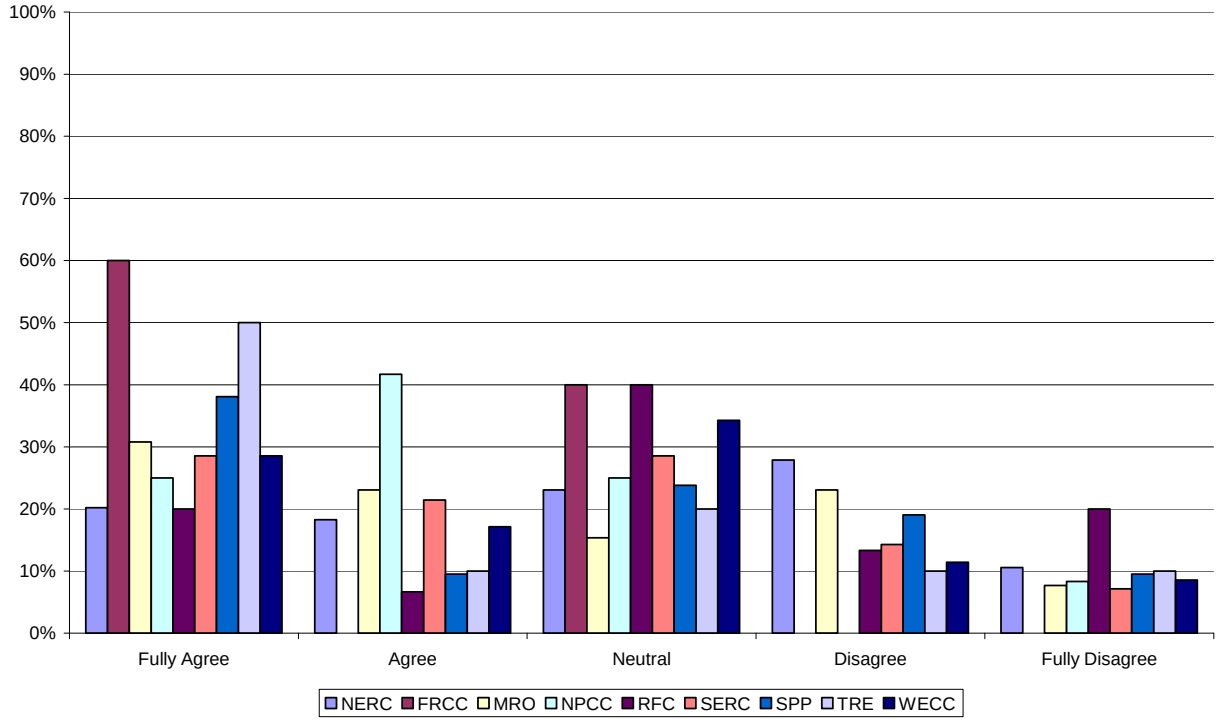
	Comments and recommendations:
16	RFC was supportive in recommending areas for compliance improvement, especially with documentation and maintenance of documentation.
17	SPP and NERC encourages registered entities to perform internal self-assessments and stresses the importance of self-reporting violations in a timely manner.
18	SPP is a party to the IRC Standards Review Comments, please refer to that submittal for our response to this question.
19	The FRCC and it's committees through the formal compliance program and through informal communications constantly reinforces the need to regular review compliance and share best practices. The overall NERC system of on site audits is flawed however. The once every three year (or more) cycle results in a large amount of activity as the audit approaches and then a drop off in activity afterwards. As personnel turnover knowledge and experience on what the audits are about and what needs to be done and maintained is lost. Multiple audits per year, each with vastly reduced and narrow scopes would better encourage ongoing compliance since entities would not know more then a few days or weeks in advance what will be checked, and that requires keeping a high level of focus on compliance. This would also allow a range of entities to be checked on the same thing at once, allowing opportunities for best practices to be identified and shared.
20	The MRO has strongly communicated the importance of self-reports.
21	The process is effective in encouraging entities to conduct self assessments. There is no real carrot to encourage self reporting.
22	The regions provide several yearly compliance workshops to educate and encourage entities to develop a compliance structure including internal self-assessments (internal audits) and self-report any possible violations.
23	They encourage self-reporting, but offer no assistance in self-assessments. I have asked for clarifying help a few times and each time been warned - if we find out that your evidence is inadequate, then you will be found in violation. Whatever happened to amnesty when seeking help?
24	This is always stressed at any contact we've had with either NERC or WECC.
25	Until a reasonable number of 2008 violations are processed and published, EEI believes that the industry has no way of knowing whether appropriate credit for self-reports is being given. In fact, the length of the process coupled with the overly burdensome administrative requirements even for seemingly minor violations, may, in some cases, be viewed as a disincentive towards self-reporting. NERC should work with FERC and the industry stakeholders to develop a process to ensure that minor violations that are self-reported with acceptable mitigation plans are dealt with on an expedited, non-penalty basis.
26	Until a reasonable number of 2008 violations are processed and published, the industry has no way of knowing whether appropriate credit for self-reports is being given. In fact, the length of the process coupled with the overly burdensome administrative requirements even for seemingly minor violations, may, in some cases, be viewed as a disincentive towards self-reporting. NERC should work with FERC and the industry stakeholders to develop a "Traffic Ticket" process to ensure that minor violations that are self-reported with acceptable mitigation plans are dealt with on an expedited basis.
27	Until a reasonable number of 2008 violations are processed and published, the industry has no way of knowing whether appropriate credit for self-reports is being given. In fact, the length of the process coupled with the overly burdensome administrative requirements even for seemingly minor violations, may, in some cases, be viewed as a disincentive towards self-reporting. NERC should work with FERC and the industry stakeholders to develop a "Traffic Ticket" process to ensure that minor violations that are self-reported with acceptable mitigation plans are dealt with on an expedited, non-penalty basis.
28	WECC appeared to precipitate numerous false positives (overcautionous self-reports of pre-June 18 violations.
29	WECC began promoting these bahaviours early and continue to do so to this day. WECC has been outstanding in this regard. Self assessment could be better encouraged if an entity knows that self reporting would result in a lesser sanction.
30	WECC may have been too effective in encouraging self-assessments and self-reports of violations. WECC reportedly received so many self-reports of violations before and after the June 18, 2007 effective date of mandatory compliance that it created a violation processing backlog that burdens WECC to this day.

	Comments and recommendations:
31	Yes. There is an emphasis on self-reporting. There has been little feedback on the value that mitigation has for the reporting entity.

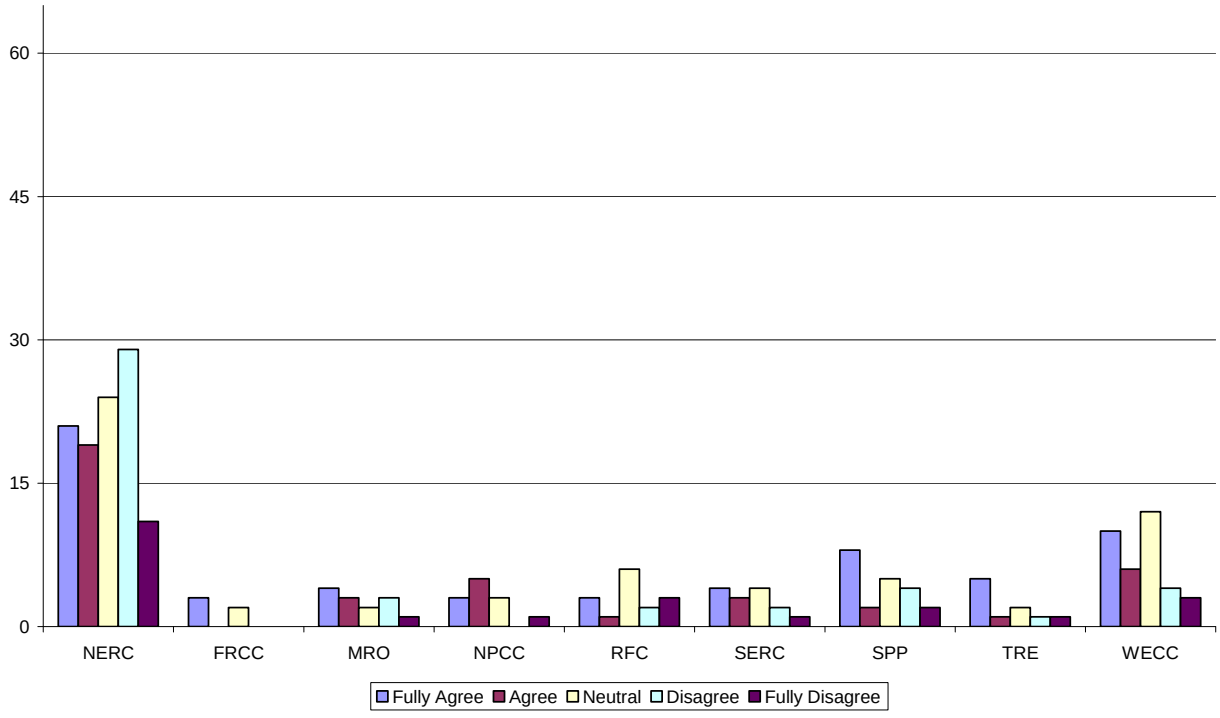
19. NERC "Sanctions Guidelines" are understandable and in conjunction with the Violation Risk Factors and Violation Severity Levels for individual Standards, clearly communicate the likely range of financial penalty that will be imposed for violations of specific requirements of reliability standards.

	NA – Not applicable or have no opinion	1 – Fully agree	2	3 – Neutral	4	5 – Fully Disagree	Response Count
NERC	10.3% (12)	18.1% (21)	16.4% (19)	20.7% (24)	**25.0% (29)**	9.5% (11)	116
FRCC	**88.1% (37)**	7.1% (3)	0.0% (0)	4.8% (2)	0.0% (0)	0.0% (0)	42
MRO	**72.9% (35)**	8.3% (4)	6.3% (3)	4.2% (2)	6.3% (3)	2.1% (1)	48
NPCC	**73.3% (33)**	6.7% (3)	11.1% (5)	6.7% (3)	0.0% (0)	2.2% (1)	45
RFC	**70.6% (36)**	5.9% (3)	2.0% (1)	11.8% (6)	3.9% (2)	5.9% (3)	51
SERC	**72.0% (36)**	8.0% (4)	6.0% (3)	8.0% (4)	4.0% (2)	2.0% (1)	50
SPP	**60.4% (32)**	15.1% (8)	3.8% (2)	9.4% (5)	7.5% (4)	3.8% (2)	53
TRE	**76.2% (32)**	11.9% (5)	2.4% (1)	4.8% (2)	2.4% (1)	2.4% (1)	42
WECC	**49.3% (34)**	14.5% (10)	8.7% (6)	17.4% (12)	5.8% (4)	4.3% (3)	69
					Comments and recommendations:		42
						answered question	**126**
						skipped question	**16**

ERO Survey - Compliance
Question 19



ERO Survey - Compliance
Question 19



	Comments and recommendations:
1	1. Penalty Calculator needs to be made public. 2. Ranges of financial penalties on NERC penalty table are too broad to be meaningful.
2	1. The matrix is there, but is too broad to have any real meaning. That itself creates uncertainty.
3	Although well intended, the entire sanction and penalty process is confusing. NERC should develop a spreadsheet specific to each registered entity that states the maximum penalty than entity would be subject to for each violation, e.g. if entity XYZ violated Requiremt 3 of Standard STD-001, that entity would be subject to a fine of $$$.
4	AS A SMALL UTILITY IT HAS BEEN OVERWELMING PUTTING ALL DATA TOGETHER AND LEARNING THE COORECT/ACCETABLE DOCUMENTS TO BE IN COMPLAINCE. THERE SHOULD BEEN MORE OF START UP PERIOD FOR TRAINING AND FULL ENFORCEMENT WITH FINES Just needed more semairs. we all are learnig as we go includinG NERC AND RFC STAFF.
5	At present, there is far too much uncertainty as to the range of potential penalties for alleged and confirmed violations, because very very few violations have as yet been filed at FERC. The range of potential penalties within Attachment A to the Sactions Guidelines is extreme, as is the potential impact of mitigating and aggravating factors approved by FERC. Thus until a large number of NOPs are imposed and the associated compliance violation records are publicly disclosed, there is no basis to draw conclusions on the Sanctions Guidelines.
6	ATC supports EEI's comments
7	Because the penalty calculator used to implement the Sanction Guidelines is not transparent and available to Registered Entities, there is no way for Registered Entities to determine a true likely range of financial penalties for a specific instance of a violation.
8	Compliance documentation should never be a "High Risk"
9	From an outside perspective, NERC has a black box method on how to determine the penalty of a violation. To gain transparency, the industry has asked for the tool, but NERC has declined to make the tool available. Without such knowledge, the existing ranges in the sanction guidelines are very wide and with the "per violation / per day" factor can create levels that could reach a material level threshold for public disclosure in accordance with SEC regulations. This creates a situation of unbounded financial risk risk that was clearly not intended, particularly for lesser administrative type items with minimal impacts on reliability.
10	Have no real idea of what penalties, if any, are going to be imposed.
11	I am okay with the general ranges, but it appears that the 'per day' part of the violation is not being enforced in most of the settlements amounts that have been made public. This may be a point of emphasis going forward for NERC and FERC.
12	IMEA is not able to adequately comment due to limited resources available to monitor such plans. IMEA supports comments submitted by the Transmission Access Policy Study Group (TAPS) and the American Public Power Association (APPA).
13	In determining financial penalties, NERC and the REs utilize a non-public penalty tool. There is concern that the penalty tool has not been properly vetted by industry stakeholders and regulatory authorities to determine if the factors/indices utilized in the tool are able to accurately calculate a financial penalty based on the impact the violation has on the reliability of the bulk power system. NRECA is concerned that the NERC Sanction Guidelines – which are public – are not being utilized to guide NERC/REs in determining penalties. More specifically, we are unsure if NERC and the REs are using the “Base Penalty Amount Table” included as Appendix A of the NERC Sanction Guidelines. The bulk power system owners, operators, and users must have a clear understanding of how penalties are being calculated. With the use of the non-public penalty tool and the possibility that the “Base Penalty Amount Table” is not being utilized, the industry stakeholders do not have a clear basis to determine the appropriateness of the penalties being calculated and assessed. The penalty tool, if it is being used by NERC and the REs, must be made public and included in the NERC Sanctions Guidelines so that FERC and the industry clearly understand how penalties are being determined.
14	It appears that the Sanctions Guidelines are confidential and to date there has been no transparency as to how penalties are calculated and it is not clear that penalty calculations are regionally consistent. The regions are not willing to share the method or the formula used to determine the likely range of financial penalties that will be imposed for specific violations.

	Comments and recommendations:
15	Need more examples.
16	Negative. For entities that do not fit the normal mold of vertically integrated utility operating its own control area and belonging to one of the legacy reliabilty organizations such as MAAC or MAIN, there is little that is clear and understandable or even applicable.
17	NERC It is currently very unlikely that any entity can interpret the current Sanctions Guidelines into any reasonable estimate of a penalty to a specific standard requirement violation. The penalty amounts are extremely wide and coupled with the “per violation per day” there is no ability to discern the level of overall penalty risk an entity has for each standard. Additionally, although NERC has worked diligently to develop the VRFs and VSLs for the standards, much of what is in place has been done too hastily in order to establish them to meet deadlines. The determination of VRF and especially VSL are critical to ensuring fairness and consistency in applying sanctions and for the determination of a violation. NERC should provide more transparency on how a penalty was reached when issued in order for entities to effectively estimate what level of risk exists for each standard requirement.
18	NERC/RFC: Q8: Although the same guidelines provide a range, the ranges are too broad and ambiguity exists with the "per day" violation amounts. In other words, more transparency needs to be established as to how penalties are calculated and a calibration process established to ensure that penalties are calcualted in a consistent manner in and across the regions.
19	Penalty calculator isn't made public and arbitration process lends to inconsistancy.
20	SPP is a party to the IRC Standards Review Comments, please refer to that submittal for our response to this question.
21	The "Guilty until proven innocent from precieved noncompliance to accepted compliance." and the " penalties from non financial to up to $1M/Day per violation" makes it nearly impossible to determine the range of financial penalties that would be imposed.
22	The guidelines are understandable, however the basis for financial penalty still has a lot of subjectivity in it.
23	The NERC “Sanction Guidelines” in conjunction with the VRFs and the VSLs communicate the likely range of financial penalty that could be imposed for violations of specific requirements of reliability standards. How NERC arrived at the distribution of the penalties in the penalty matrix consisting of the VRFs and VSLs is still unclear and also seems skewed towards overly-heavy sanctions. The sanction guidelines should also offer an explanation regarding the treatment of sub requirements which are not really requirements but explanatory text.
24	The NERC “Sanction Guidelines” in conjunction with the VRFs and the VSLs communicate the likely range of financial penalty that could be imposed for violations of specific requirements of reliability standards. How NERC arrived at the distribution of the penalties is still unclear and also seems skewed towards overly-heavy sanctions. Since the process is skewed toward assigning most requirements in the Medium-High risk range and towards Severe VSLs, almost any procedural requirement theoretically results in a proposed sanction of several hundred thousand dollars per day. The sanction guidelines should also offer an explanation regarding the treatment of sub requirements which are not really requirements but explanatory text. The way NERC has guided the process; most VRF-VSLs fall in the Medium-High risk VRF/Severe VSL range. This includes many requirements dealing with documentation. Lack of granularity and proportionally takes resources and focus from those things that truly impact reliability. There should be more granularity in the VRFs and there should be an objective process for assigning both VRFs and VSLs.
25	The per day aspect of the financial penalties in the "Sanction Guidelines" remain unclear.
26	The ranges are so large, and the guidance so general that it provides very little useful information as to the likely size of a financial penalty.

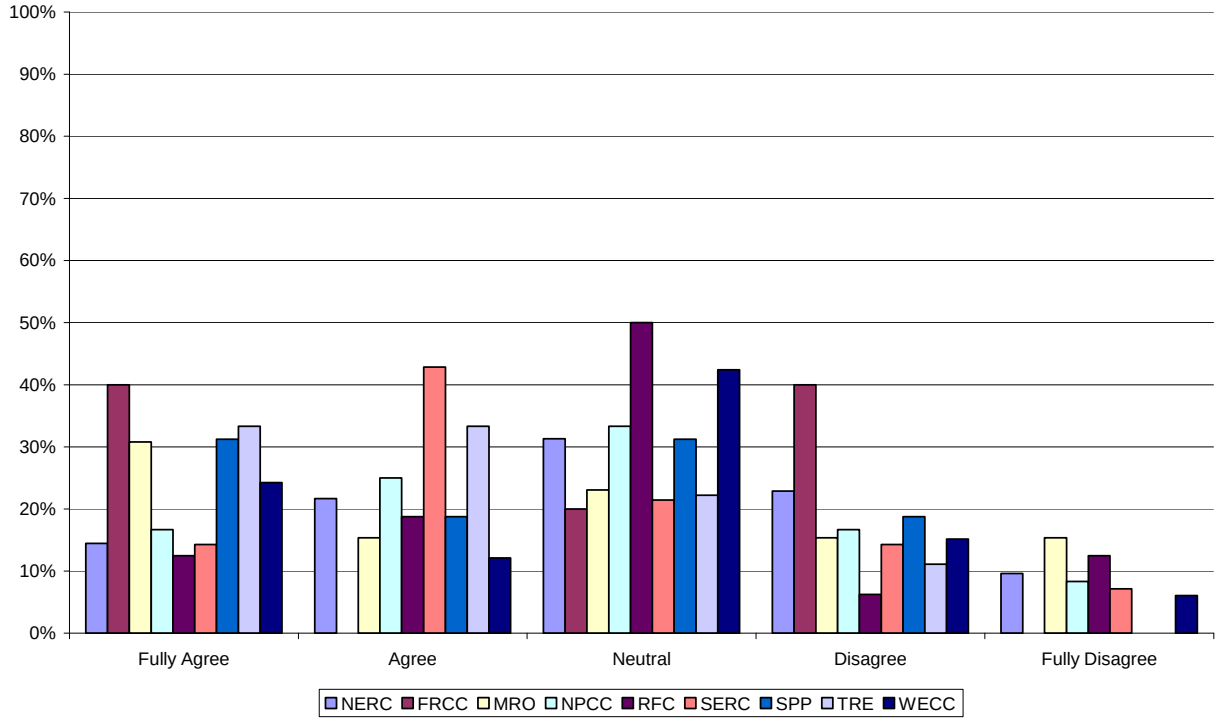
	Comments and recommendations:
27	The ranges in the Sanctions Guidelines are too wide and coupled with the "per violation/per day" calculation make it nearly impossible to determine the likely range of financial penalties that will be imposed for specific violations, and to ensure that a monetary penalty reflect a reasonable relationship between a violation and the risks to bulk power system reliability. For example, for a High-Severe violation, the range is anywhere from $20,000 to $1,000,000 per day. For a violation time period of 30 days, this gives a final range of $600,000 up to $30,000,000. This ambiguity makes internal communication within corporations difficult at best. In addition, corporations have to satisfy SEC regulations for public disclosure of potential material impacts to earnings. To date, there has been no transparency as to how penalties are calculated and it is not clear that penalty calculations are regionally consistent. NERC should work with FERC and the industry stakeholders to develop a process to ensure that minor violations that are self-reported with acceptable mitigation plans are dealt with on an expedited, non-penalty basis.
28	The ranges in the Sanctions Guidelines are too wide and coupled with the "per violation/per day" calculation make it nearly impossible to determine the likely range of financial penalties that will be imposed for specific violations. For example, for a High-Severe violation, the range is anywhere from $20,000 to $1,000,000 per day. For a violation time period of 30 days, this gives a final range of $600,000 up to $30,000,000. This ambiguity makes internal communication within corporations difficult at best. In addition, corporations have to satisfy SEC regulations for public disclosure of potential material impacts to earnings. To date, there has been no transparency as to how penalties are calculated and it is not clear that penalty calculations are regionally consistent. NERC should work with FERC and the industry stakeholders to develop a "Traffic Ticket" process to ensure that minor violations that are self-reported with acceptable mitigation plans are dealt with on an expedited basis.
29	The ranges in the Sanctions Guidelines are too wide and coupled with the "per violation/per day" calculation make it nearly impossible to determine the likely range of financial penalties that will be imposed for specific violations. For example, for a High-Severe violation, the range is anywhere from $20,000 to $1,000,000 per day. For a violation time period of 30 days, this gives a final range of $600,000 up to $30,000,000. This ambiguity makes internal communication within corporations difficult at best. In addition, corporations have to satisfy SEC regulations for public disclosure of potential material impacts to earnings. To date, there has been no transparency as to how penalties are calculated and it is not clear that penalty calculations are regionally consistent. NERC should work with FERC and the industry stakeholders to develop a "Traffic Ticket" process to ensure that minor violations that are self-reported with acceptable mitigation plans are dealt with on an expedited, non-penalty basis.
30	The ranges in the Sanctions Guidelines are too wide and coupled with the "per violation/per day" calculation make it nearly impossible to determine the likely range of financial penalties that will be imposed for specific violations. The penalty matrix is arbitrary, and to date there has been no transparency as to how penalties are calculated and it is not clear that penalty calculations are regionally consistent. The question does not apply to SERC.
31	The sanction guidelines show the range of penalties but that is not sufficient. The entities want to know the specifics of what goes into calculating the penalty. The penalty tool needs to be made public.
32	The Sanctions Guidelines are understandable. However, the penalty ranges are broad making it difficult to anticipate the penalty amount given the potential effect of mitigating and aggravating factors.
33	The secrecy about penalties and sanctions is counter productive. The vague risk of a potentially large penalty is not as useful in motivating correct actions/decisions as a concrete figure. While we understand NERC wants to prevent cost/benefit analysis of non-compliance; sometimes a cost/benefit analysis would motivate correct decision making. The secrecy also makes it appear as if the penalties are subjective and not based on a strict set of guidelines.

	Comments and recommendations:
34	The Violation Risk Factors are easy to understand. The Violation Severity Levels, however, are not constructed very well. It appears that in many cases, the VSL's are quite arbitrary and not based on the true severity of the violation. It's as though the degrees of violation were force-fit into 4 categories, when in many cases there should only be one or two VSL's specified. Additionally, the FERC-approved NERC Standards as posted on the official NERC website still have the old "Levels" of non-compliance (Level 1, 2, 3, and 4), and the entities are required to use a well-hidden set of tables of VSL's to substitute for the non-compliance sections of the approved Standards. All of this information regarding the approved Standards, including the non-compliance VSL's, should be kept in one place for the entities to have a reasonable chance of identifying the compliance expectations. Regarding the ranges of possible financial penalty resulting from violation of the Requirements, the ranges of such penalties are so broad that they are not very meaningful or helpful. However, we do support the concept of a wide range of penalty and discretion to be exercised by the Region based on various subjective factors.
35	The VRF and VSL applied to the standards have been changing. Also, NERC's failure to disclose the penalty calculator leaves potential penalties unknowable.
36	There is some confusion in this area about how it works, how it is applied, etc., for many entities.
37	Violation Risk Factors ("VRF") and Violation Severity Levels ("VSL") must be used in the context of the actual registered entities size and reliability impact rather than the specific standards. There is a big distinction between how 30 MW electric utilities versus a 3,000 MW electric utilities can impact neighboring system. FERC's efforts to remove the VRF/VSL from the NERC standard process to NERC staff is a concern. Historically NERC and the RRO's had staff that had planning and operating experience. This has changed. Many of knowledge base is gone. As an example we have attended NERC/WECC conferences where the person discussing the PRC-005 standards clearly never developed setting for the relay. It was also clear that a high level NERC compliance staff member confused reliability with keeping all of the lights on all of the time. Anyone that has performed system planning, even for a very short time, realizes their comments are ridiculous. In many cases dropping load is a solution to maintain reliability, protect equipment, and stop uncontrolled cascading.
38	VSL and VRF are not understandable. There should be one comprehensive list. The only way to get all of the information together is to refer to all of the previous FERC orders. Even then, the actual application of the information has so many subjective elements, that a clear indication of the potential financial penalty is not possible. Also, since there has been no detailed information made available to the public with clear parameters concerning the financial penalty, no anecdotal information is available either.
39	VSLs should not be assigned to sub-Requirements.
40	We need more work on this area. Some of the Violation Risk Factors and Severity Levels are not properly alligned. I've seen some requirements that are strictly used to force the industry to keep proper documentation be given a high severity level that does not directly affect the reliability of the system. We are focusing too much on proving that we're compliant and not in the proper training, or operation, of the bulk system.
41	While the likely range of a base penalty amount is relatively transparent, the ranges are too wide to be meaningful. A complicating factor is the presence of varying Violation Risk Factors among the subrequirements of a single requirement. In at least one case, there exists the non-intuitive condition where the VRF of a subrequirement is higher than the requirement itself. Additionally, there is no transparency regarding the amounts by which mitigating and aggravating factors could move a penalty beyond its base range.
42	While the sanction guidelines are clear and the penalty matrix with VRF's and VSL's provide a range for imposing financial penalties, the majority of penalties are thru settlement discussions and not part of the public record. The public record of penalties does not provide detail to determine if penalties are consistently being applied across regions or consistent with the sanctioning guidelines.

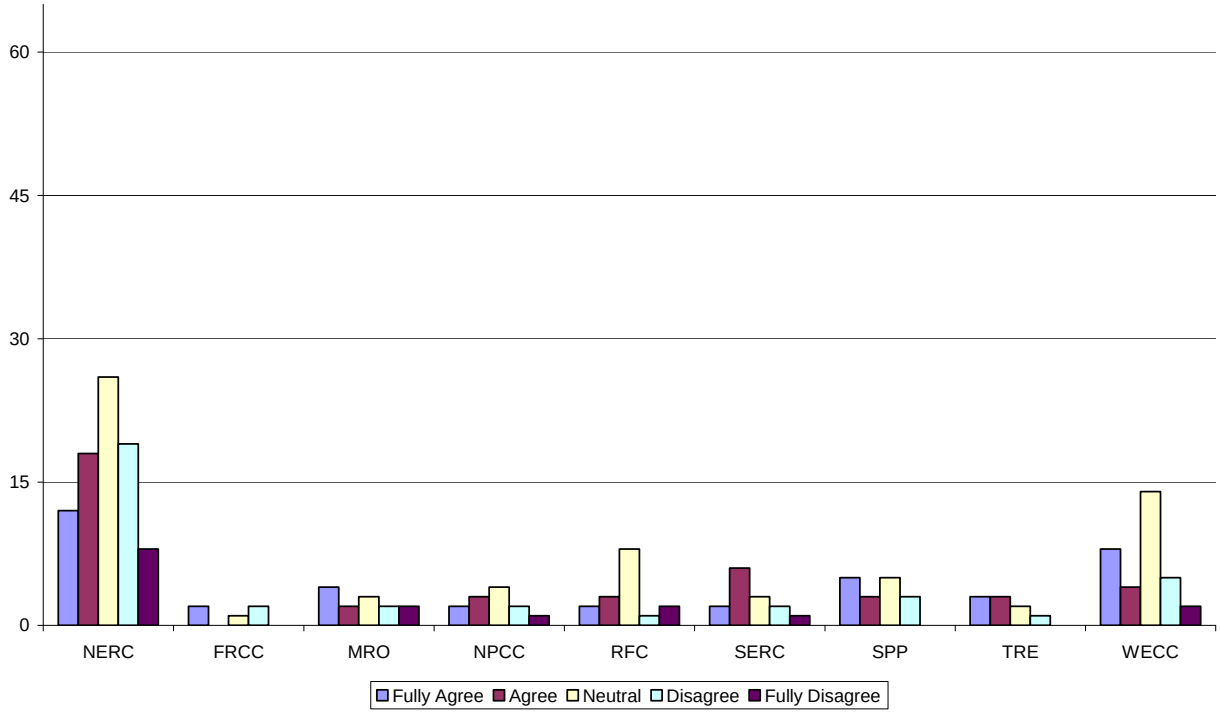
20. Penalties and sanctions bear a reasonable relation to the seriousness of the violation and the potential consequences to the reliability of the bulk power system, and consider the entity's timely remedial efforts (or lack thereof) and the quality of the entity's overall compliance efforts.

	NA – Not applicable or have no opinion	1 – Fully agree	2	3 – Neutral	4	5 – Fully Disagree	Response Count
NERC	**26.5% (30)**	10.6% (12)	15.9% (18)	23.0% (26)	16.8% (19)	7.1% (8)	113
FRCC	**88.1% (37)**	4.8% (2)	0.0% (0)	2.4% (1)	4.8% (2)	0.0% (0)	42
MRO	**72.9% (35)**	8.3% (4)	4.2% (2)	6.3% (3)	4.2% (2)	4.2% (2)	48
NPCC	**72.7% (32)**	4.5% (2)	6.8% (3)	9.1% (4)	4.5% (2)	2.3% (1)	44
RFC	**69.2% (36)**	3.8% (2)	5.8% (3)	15.4% (8)	1.9% (1)	3.8% (2)	52
SERC	**72.0% (36)**	4.0% (2)	12.0% (6)	6.0% (3)	4.0% (2)	2.0% (1)	50
SPP	**69.8% (37)**	9.4% (5)	5.7% (3)	9.4% (5)	5.7% (3)	0.0% (0)	53
TRE	**78.6% (33)**	7.1% (3)	7.1% (3)	4.8% (2)	2.4% (1)	0.0% (0)	42
WECC	**53.5% (38)**	11.3% (8)	5.6% (4)	19.7% (14)	7.0% (5)	2.8% (2)	71
					Comments and recommendations:		45
						answered question	**123**
						skipped question	**19**

ERO Survey - Compliance
Question 20



ERO Survey - Compliance
Question 20



	Comments and recommendations:
1	1. To date, Penalties determined by WECC do not appear to relate directly to the VSLs and VRFs. 2. WECC to date has refused to provide any credit for Self Reporting, timely remediation, or what they have otherwise characterized as our high-quality Internal Compliance Program. 3. WECC has, in all instances, denied ALL possible mitigating credit, citing "management involvement". WECC has not provided any justification for this allegation, and we have refuted it repeatedly. 4. Since NERC has not yet ruled on any of our penalties and sanctions, we have no basis upon which to answer this question with respect to NERC at this time.
2	Although to date most VRFs and VSLs appear to be reasonable, we are concerned by the move to limit stakeholder decision making for these factors in the future.
3	As of February 20, 2009, no final penalty determinations from WECC's jurisdiction have become publicly available. Anecdotes from registered entities that have received Notices of Alleged Violation from WECC suggest that the proposed base penalty amounts are excessively high.
4	As WECC/NERC has yet to publish any WECC penalties since 2007 audit process, we cannot determine if they are reasonable
5	At this point, it is not clear that penalties and sanctions are in line with the actual negative impact that the violation has had on the reliability of the grid. Many factors including requirements, VRFs & VSLs, and the inherent bias of the sanctions need to be addressed before reaching a conclusion on the appropriateness of the sanctions or penalties.
6	Based upon current outcomes posted I believe that a determination is being made that is realistic for the particular violations.
7	Can't say as we have not seen any penalties yet.
8	Consistency in penalties, based on impact to the BES, cannot be determined based on backlog of violations
9	CWL performed very well during our first compliance audit. We have had no issues that resulted in penalties or sanctions. However, I have to believe that penalties and sanctions would bear a reasonable relation to the seriousness of a violation and the potential consequences to the reliability of the bulk power system.
10	For the small fraction of the alleged violations which have been processed and made public, it appears as if the penalties appropriately relate to the seriousness of the violations. However, it does not appear that sufficient credit is given to self-reporting and aggressive/timely corrective actions taken by the registered entity.
11	IMEA is not able to adequately comment due to limited resources available to monitor such plans. IMEA supports comments submitted by the Transmission Access Policy Study Group (TAPS) and the American Public Power Association (APPA).
12	It is our feeling that the penalties and sanctions are excessive in most instances. While they are graduated based upon the Violation Risk Factors and the Severity Level of the violations, we believe that sanctions to this degree are unnecessary to bring about the necessary changes to mitigate violations.
13	NERC At this point, it is not clear that penalties and sanctions are in line with the actual negative impact that the violation has had on the reliability of the grid. Many factors including requirements, VRFs & VSLs, and the inherent bias of the sanctions need to be addressed before reaching a conclusion on the appropriateness of the sanctions or penalties. NPCC The efficiency of NPCC's compliance and enforcement program is determined by NERC's programs and issues associated with NERC's processes and sanction guidelines.
14	NERC With the current level of penalty violations, it is reasonable to assume that the penalties have been appropriate to the level and seriousness of the standard violation. What is not known is whether that trend will continue. NERC must continue to provide consistency not only between the Regional Entities but also between individual violations of the same standard. NERC should focus on producing penalty decisions that promote prevention of reoccurrence of violations.
15	NERC Q9: Since there is insufficient violation and penalty history due to the backlog, there is ambiguity whether or not the penalties and sanctions bear a reasonable relation to the seriousness of the violation. NERC should reference the NRC model for insight and experience on a proven method to encourage strong performance with minimal monetary penalties.

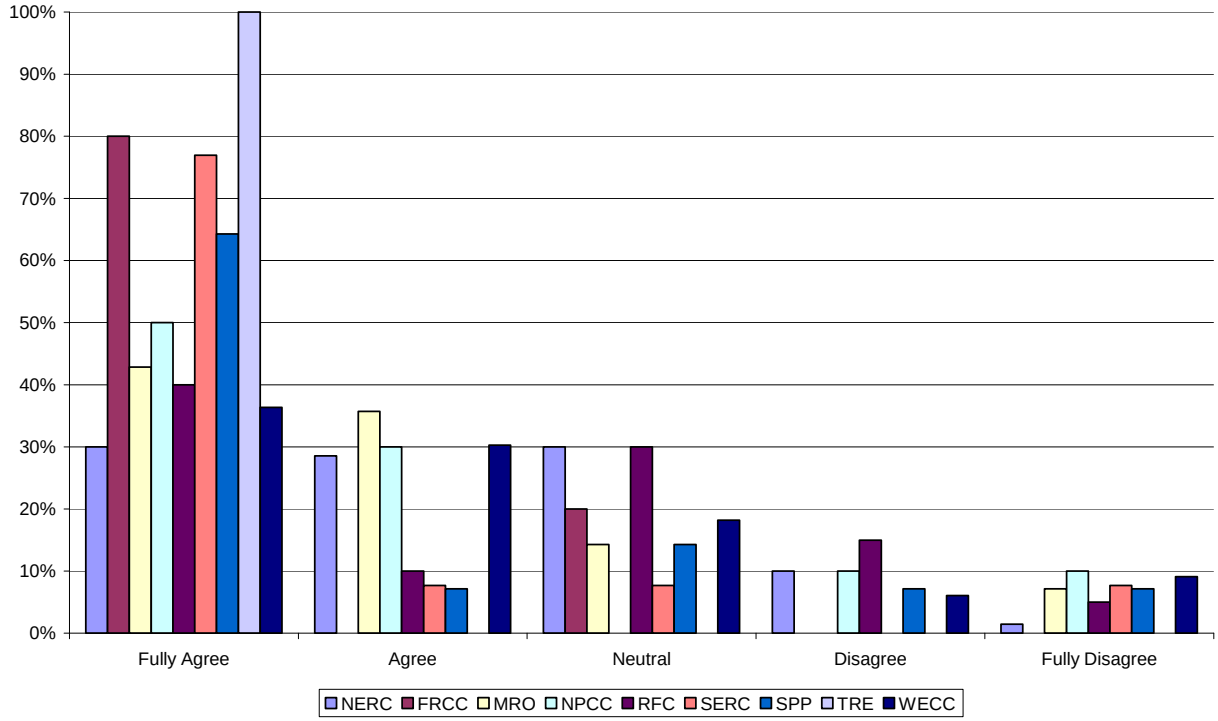
	Comments and recommendations:
16	NERC WILL TREAT A SMALL UTILITY SAME AS LARGE TO ETC.
17	No audit to date
18	No experience. We think yes but reserve judgment. The possibility of penalties that get compounded over time is unnerving.
19	No real experience.
20	Not enough penalties have moved through the process to provide sufficient precedence on which to judge this.
21	Penalties and sanctions should be based on VRFs and VSLs that are vetted with a standard that is under review. NERC should not have the authority to receive stakeholder input then set any level of VSL for a requirement.
22	Please see response to question #8. I also want to add that NERC and the various REs have been extremely professional and reasonable when considering an entity's remedial efforts. At the end of the process, the penalties have reflected the seriousness of the offense.
23	See response to question 8.
24	So far the sanctions and penalties that have been publicly posted appear to be very reasonable and properly considerate of the real impact of the non compliance. However there has been a lot of self reports and findings of possible non compliance that have not yet made it all the way through the system and been posted. So we are reserving final judgment until we see a wider range of examples.
25	Some of the penalties and sanctions are higher than appropriate for level of risk to the interconnection.
26	SPP is a party to the IRC Standards Review Comments, please refer to that submittal for our response to this question.
27	Suggested penalties and sanctions for documentation errors with no impact on the BES are disproportionate and unreasonable.
28	The back log at NERC has limited the data needed to determine if there is a balance between penalties and sanctions to the noncompliance. There are mixed signal when NERC establishes VRFs and VSLs, based on sound engineering and operational proactices, and the FERC Staff directs these be reaised to higher levels, when there is no evidence to support a greater level of reliability based on the higher levels of VRFs and VSLs.
29	The backlog of compliance violations does not permit a comprehensive analysis of this question, but it appears that minor administrative violations are being treated with the same level of scrutiny over many months that more serious violations are being addressed. This is not a positive indication that there will be a reasonable relation. Unfortunately, some stakeholder processes are being bypassed to increase VRFs and VSLs without the benefit of subject matter expertise being employed to provide technical justification for the changes.
30	The District has not received a penalty or sanction, but our neighboring electric utilities have and they appear excessive and contrary to reliability. The time and effort to address a vegetation outage event caused other maintenance and expansion projects to be deferred. These deferrals were the real reliability issue.
31	The lack of information on “settled” packages and the violations included makes this question difficult to assess.
32	The process is not transparent and so far limited statistics are available to adequately respond to this question. However, it appears that FERC has been directing NERC to raise the levels of certain Violation Risk Factors irrespective of input of industry stakeholders to the contrary. There seems to be a bias to move violations into the higher VRF and VSL categories, but it is not clear to us that this will have the desired result of improving reliability. We believe that NERC and FERC should focus on ensuring that entities propose and implement comprehensive mitigation plans to enhance reliability processes and to prevent reoccurrence of violations. For example, the NRC model which encourages strong performance with minimum monetary penalties. SERC - The process is not transparent and so far limited statistics are available to adequately respond to this question.
33	There is not enough information at this time to make an assessment as to whether penalties and sanctions bear a reasonable relation to the seriousness of the violation
34	There's no real information to determine this due to the backlog and lack of availability of the Penalty Calculator.

	Comments and recommendations:
35	They seem to be more of a "one size fits all" than related to the actual impact on the grid. Why shuld a radial transmission line have the same penalty as any other if its impact on the grid is nominal?
36	Too early to tell with the limited number of public audit reports. For FAC-003, a key element in most blackout, the penalities assessed appear to low.
37	Too much emphasis is placed on financial penalty. The primary focus should be preservation or enhancement of the bulk power system. The large backlog of unconfirmed violations should be processed in short order with reliability issues and corresponding resolution communicated across the industry. NERC should request FERC to waive financial penalty for confirmed violations for an extended period of time. This will allow NERC, FERC and the Regions to process the unconfirmed violation backlog in an expedient manner and encourage additional self-reporting. Reliability concerns need to take center stage.
38	Violations that do not effect the BES should incur penalties (such as documentation issues) for the first offence.
39	VSLs do not appear to relate well to potential consequences to reliability. They too often have a percentage-based administrative character, are mistakenly assigned to sub-Requirements, and do not relate to actual reliability risks and consequences. So, the real level of severity is not clear, and more importantly the focus is on gradations of administrative elements rather that actual reliability.
40	We have no direct experience with penalties or sanctions, and only limited explanations are made public.
41	With FERC acting as the enforcement officer by assessing the final penalties and sections and regularly directing NERC to raise the levels of Violation Risk Factors and Violation Severity Levels. Rather than focus on the penalties, NERC and FERC should be ensuring that entities propose and implement comprehensive mitigation plans to enhance reliability processes and to prevent reoccurrence of violations.
42	With the current backlog of violation filings, it is not possible to say whether penalties and sanctions bear a reasonable relation to the seriousness of the violation. In fact, there is evidence to the contrary. FERC has contradicted the input of industry stakeholders by regularly directing NERC to raise the levels of certain Violation Risk Factors. In addition, binary Violation Severity Levels have all been moved to the SEVERE designation. There seems to be a bias to move violations into the higher VRF and VSL categories, but it is not clear to the industry that this will have the desired result of improving reliability. Rather, the focus of the Regional Entities, NERC and FERC should be on ensuring that entities propose and implement comprehensive mitigation plans to enhance reliability processes and to prevent reoccurrence of violations. The NRC model provides useful insight and informative experience on a proven method to encourage strong performance with minimal monetary penalties.
43	With the current backlog of violation filings, it is not possible to say whether penalties and sanctions bear a reasonable relation to the seriousness of the violation. In fact, there is evidence to the contrary. FERC has contradicted the input of industry stakeholders by regularly directing NERC to raise the levels of certain Violation Risk Factors. In addition, binary Violation Severity Levels have all been moved to the SEVERE designation. There seems to be a bias to move violations into the higher VRF and VSL categories, but it is not clear to the industry that this will have the desired result of improving reliability. Rather, the focus of the Regions, NERC and FERC should be on ensuring that entities propose and implement comprehensive mitigation plans to enhance reliability processes and to prevent reoccurrence of violations. The NRC model provides useful insight and informative experience on a proven method to encourage strong performance with minimal monetary penalties.
44	With the current backlog of violation filings, it is not possible to say whether penalties and sanctions bear a reasonable relation to the seriousness of the violation. In fact, there is evidence to the contrary. FERC has contradicted the input of industry stakeholders by regularly directing NERC to raise the levels of certain Violation Risk Factors. In addition, binary Violation Severity Levels have all been moved to the SEVERE designation. There seems to be a bias to move violations into the higher VRF and VSL categories, but it is not clear to the industry that this will have the desired result of improving reliability. Rather, the focus of the Regions, NERC and FERC should be on ensuring that entities propose and implement comprehensive mitigation plans to enhance reliability processes and to prevent reoccurrence of violations. The NRC model provides useful insight and informative experience on a proven method to encourage strong performance with minimal monetary penalties.
45	Without knowing the specifics on how the penalty is calculated, this question can not be answered.

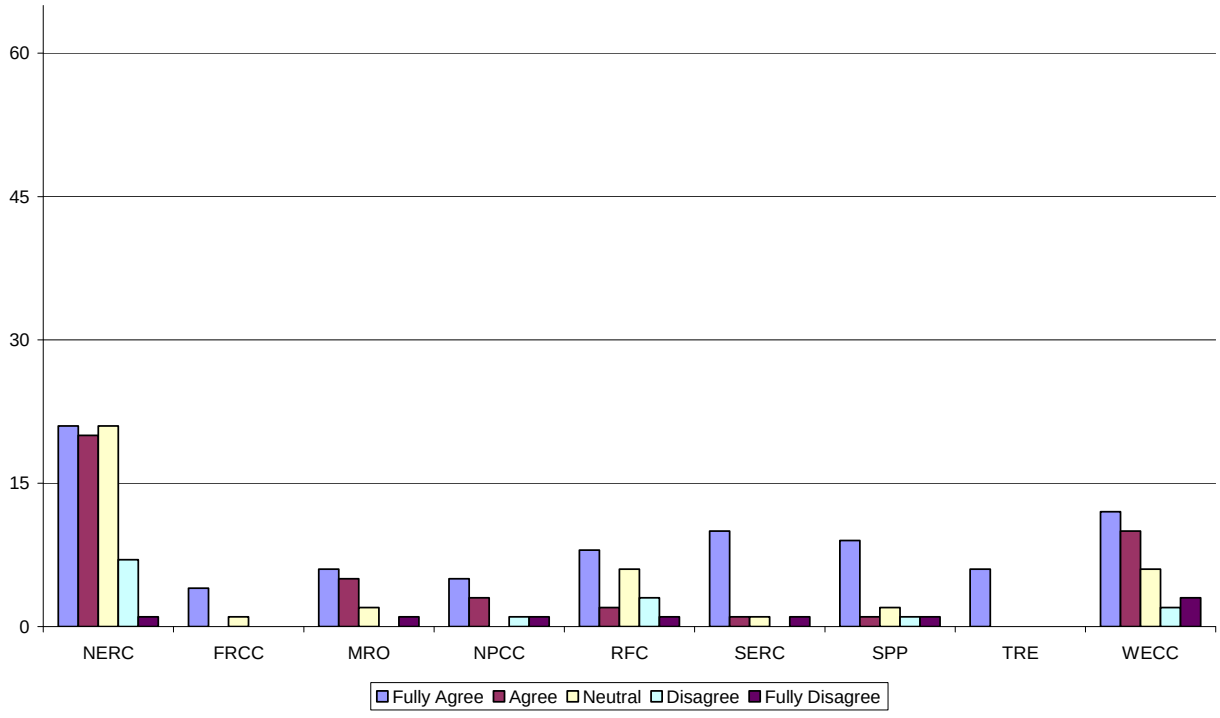
21. Is effective in ensuring that a responsible entity that has violated a reliability standard develops and timely executes a mitigation plan that will (i) remedy the cause of the violation and (ii) prevent similar recurrences.

	NA – Not applicable or have no opinion	1 – Fully agree	2	3 – Neutral	4	5 – Fully Disagree	Response Count
NERC	**37.5% (42)**	18.8% (21)	17.9% (20)	18.8% (21)	6.3% (7)	0.9% (1)	112
FRCC	**87.8% (36)**	9.8% (4)	0.0% (0)	2.4% (1)	0.0% (0)	0.0% (0)	41
MRO	**71.4% (35)**	12.2% (6)	10.2% (5)	4.1% (2)	0.0% (0)	2.0% (1)	49
NPCC	**77.3% (34)**	11.4% (5)	6.8% (3)	0.0% (0)	2.3% (1)	2.3% (1)	44
RFC	**63.0% (34)**	14.8% (8)	3.7% (2)	11.1% (6)	5.6% (3)	1.9% (1)	54
SERC	**73.5% (36)**	20.4% (10)	2.0% (1)	2.0% (1)	0.0% (0)	2.0% (1)	49
SPP	**73.6% (39)**	17.0% (9)	1.9% (1)	3.8% (2)	1.9% (1)	1.9% (1)	53
TRE	**85.7% (36)**	14.3% (6)	0.0% (0)	0.0% (0)	0.0% (0)	0.0% (0)	42
WECC	**52.2% (36)**	17.4% (12)	14.5% (10)	8.7% (6)	2.9% (2)	4.3% (3)	69
						Comments and recommendations:	31
						answered question	**125**
						skipped question	**17**

ERO Survey - Compliance
Question 21



ERO Survey - Compliance
Question 21



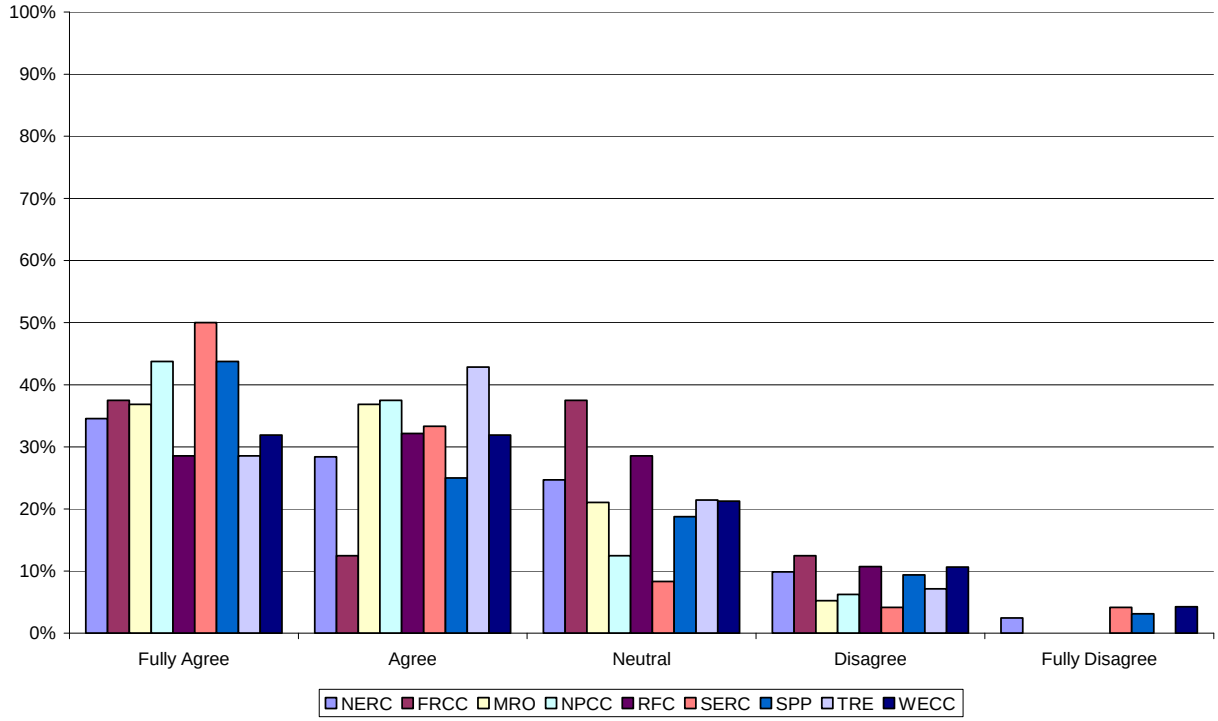
	Comments and recommendations:
1	Again, CWL performed very well during our first compliance audit. We have had no issues that resulted in mitigation plans. However, I have to believe that SPP and NERC would be effective in ensuring that mitigation plans are developed and executed in a timely manner.
2	Cannot determine if mitigation plans are implemented in a timely fashion due to the backlog of violations.
3	Do have clear deadlines to submit mitigation plans. However, Tacoma power is not fully sure what NERC/WECC are doing to ensure these will remedy the problem or prevent similar re-occurrences. NERC/WECC do not consult with the utilities anymore.
4	Due to WECC's backlog, WECC has failed to review our Mitigation Plans in a timely manner. Due to WECC's lack of response, we begin working on submitted mitigation plans as prescribed in the delegated authority from NERC to WECC. There have been instances in which WECC responds, at times more than 6 months late, that either the mitigation plan or the mitigation plan closure materials were insufficient.
5	Fully Agree. We believe this is the most critical part of the program, more important then anything else is insuring the problem is corrected.
6	It has typically taken a minimum of 6 months to receive a notice from WECC regarding completed mitigation plans. A revised mitigation plan was filed with WECC in January 2008 with no response from WECC if it was accepted. We resubmitted the documents over a month ago to WECC and still have had no response.
7	Mitigation plans are critical to ensuring than compliance issues are promptly addressed. In fact, identification and mitigation are far more important that fines in moving the process along and reduce the potential impact to the BES operation going forward.
8	NERC Mitigation plans in response to violations vary widely. NERC should provide guidance on the level of mitigation response for specific violations in order to help capture what degree of mitigation is appropriate for preventing future violations.
9	NERC The sanction guidelines are effective in ensuring that a responsible entity that has violated a reliability standard develops and timely executes a mitigation plan. However, NERC needs to revise its sanction guidelines to address the issues presented above because currently, entities are being more responsive and proactive themselves in developing these mitigation plans as opposed to being pressured by NERC sanction guidelines to doing so. NPCC The efficiency and effectiveness of NPCC's compliance and enforcement program is determined by NERC's programs and issues associated with NERC's processes and sanction guidelines. As stated above, there are issues associated with the process including sanction guidelines and these need to be resolved on a priority basis as these directly affect each region's processes and sanction guidelines including those of NPCC's
10	NERC- NERC, at the behest of FERC, seems to focus more on penalties than on reliability improvement.
11	NERC Q 10: The uniform CMEP does not require a mitigation plan to be submitted until after the notice of alleged violation is issued. An interim mitigation plan should be required earlier in the process to eliminate any immediate reliability concerns.
12	NERC's involvement in this process is not transparent. The process is not transparent and so far limited statistics is available to adequately respond to this question.
13	No audit to date
14	No Comment
15	No real experience.
16	RFC has worked very closely with NIPSCO in its development of mitigation plans and their implementation.
17	See ans Q9
18	See response to question 8.
19	SPP is a party to the IRC Standards Review Comments, please refer to that submittal for our response to this question.
20	The new language proposed in NERC's February 17, 2009 compliance filing with FERC regarding mitigation plan acceptance timelines is a positive step in at least providing the registered entities with notice that review of a mitigation plan will take longer than anticipated and give the entity more certainty around the timing.

	Comments and recommendations:
21	The process whereby NERC participates in the mitigation plan review and approval is not transparent.
22	The process whereby NERC participates in the mitigation plan review and approval is not transparent.
23	The process whereby NERC participates in the mitigation plan review and approval is not transparent.
24	The Regional Entities appear to be successfully overseeing the development and implementation of mitigation plans. However, a few of the Notice of Penalty filings demonstrated that some mitigations plans were not timely completed by the registered entity. Although it is the exclusive responsibility of the registered entity to execute the mitigation plans, more aggressive regulatory oversight and monitoring may have assured that such commitments made by the registered entities were timely met.
25	The sanction guidelines are effective in ensuring that a responsible entity that has violated a reliability standard develops and timely executes a mitigation plan. However, NERC needs to revise its sanction guidelines to address the issues presented above because currently, entities are being more responsive and proactive themselves in developing these mitigation plans as opposed to being pressured by NERC sanction guidelines to doing so. Entities should be able to get an expeditious conditional approval on mitigation plans. This will allow them to start work earlier to address the problem.
26	There is some evidence that entities are executing mitigation plans in a timely manner, however the feedback loop is too slow, so that it is difficult to judge.
27	Timely approval/disapproval of mitigation plans would help.
28	turnover rate for mitigation plan accept and reject are too long.
29	We have no direct experience with these issues, and only limited explanations are made public.
30	WECC appears to be more concerned about clearing its paperwork backlog than in reviewing mitigation plans and their timely completion. Mitigation plans are often brought to completion by a registered entity long before WECC informs the registered entity if the plans have been accepted.
31	Yes. There is an emphasis on mitigation. However, there has been little feedback as to the value of mitigation in alleviating penalties

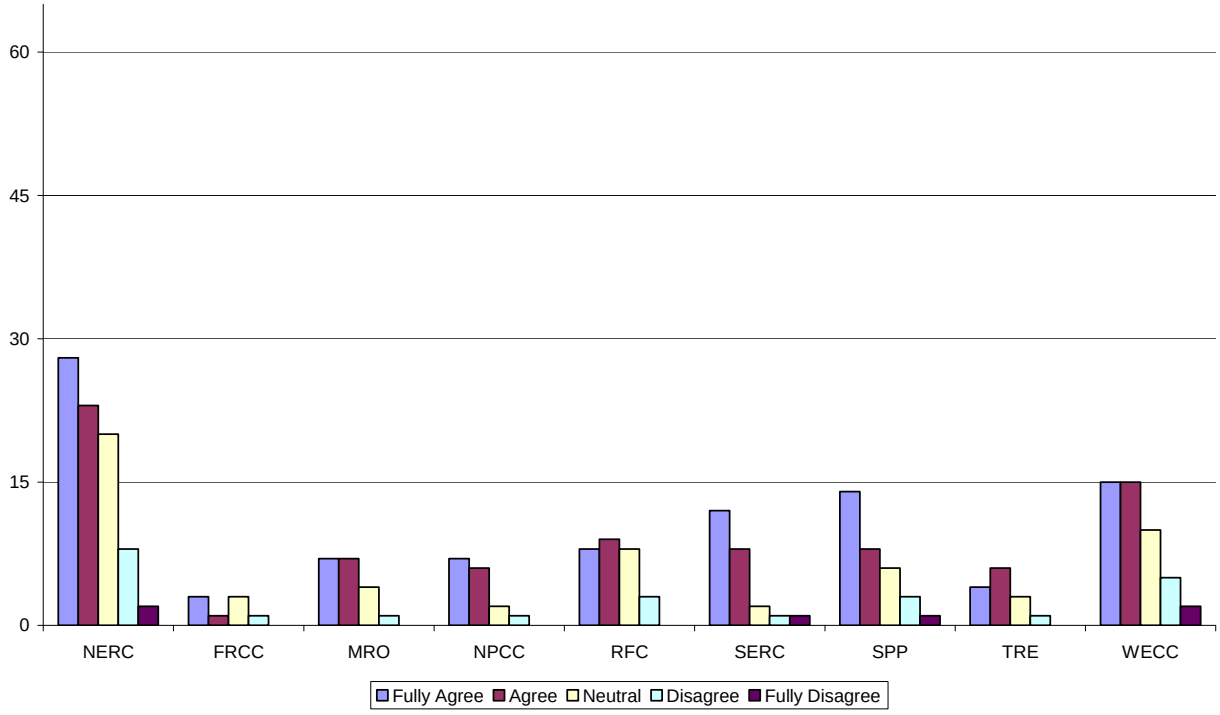
22. Utilizes electronic tools and forms that provide for clear, effective, and efficient submittal and handling of compliance information.

	NA – Not applicable or have no opinion	1 – Fully agree	2	3 – Neutral	4	5 – Fully Disagree	Response Count
NERC	25.0% (27)	**25.9% (28)**	21.3% (23)	18.5% (20)	7.4% (8)	1.9% (2)	108
FRCC	**81.4% (35)**	7.0% (3)	2.3% (1)	7.0% (3)	2.3% (1)	0.0% (0)	43
MRO	**62.7% (32)**	13.7% (7)	13.7% (7)	7.8% (4)	2.0% (1)	0.0% (0)	51
NPCC	**65.2% (30)**	15.2% (7)	13.0% (6)	4.3% (2)	2.2% (1)	0.0% (0)	46
RFC	**50.0% (28)**	14.3% (8)	16.1% (9)	14.3% (8)	5.4% (3)	0.0% (0)	56
SERC	**53.8% (28)**	23.1% (12)	15.4% (8)	3.8% (2)	1.9% (1)	1.9% (1)	52
SPP	**43.9% (25)**	24.6% (14)	14.0% (8)	10.5% (6)	5.3% (3)	1.8% (1)	57
TRE	**67.4% (29)**	9.3% (4)	14.0% (6)	7.0% (3)	2.3% (1)	0.0% (0)	43
WECC	**34.7% (25)**	20.8% (15)	20.8% (15)	13.9% (10)	6.9% (5)	2.8% (2)	72
					Comments and recommendations:		44
						answered question	**125**
						skipped question	**17**

ERO Survey - Compliance
Question 22



ERO Survey - Compliance
Question 22



	Comments and recommendations:
1	AEP recommends that NERC ensure that all REs use the same portal to aid in the provision of regional consistency.
2	All information that is required to be submitted to RFC,should be posted on the RFC Portal. All submittals should go through the Portal instead of some going through emails.
3	Although NERC is not directly responsible for developing and utilizing electronic forms for compliance information, NERC does have an obligation to advocate for regional consistency.
4	Both NERC and WECC organizations have designed the submittal systems without sufficient regard for the need of business units to circulate draft versions for editing and approval purposes prior to submittal. The systems also fail to plan for the need for internal recipients of the externally submitted documents to avoid confusion and possible repetitive submissions and the need to keep copies for evidence of compliance. Both systems create additional work load for Registered Entities. This survey is a good example. In order to circulate and gather responses, the survey had to be moved to Word and then moved back, response by response. Also, despite repeated requests for the quarterly meetings and monthly phone calls held by WECC to provide guidance to the Registered Entities to record or publish summarized reports, WECC refused saying it was too costly and time consuming. However, there seemed to be time to answer the same questions repeatedly in subsequent meetings. This not only raised the frustration level with WECC staff , but also the participants who often had to sit through the same questions/responses in excess of 10 times, and often in situations where the participants had paid to attend. Another good example is the WECC limit to 125 participants on their previous monthly "Open Microphone" calls. There are over 400 Registered Entities in the WECC region. If only one participant called in from each RE, over two/thirds of the REs were unable to participate.
5	CDMS is improving, but could be a better tool.
6	Effective October 1, 2008, WECC requires that registered entities utilize its compliance web portal for all compliance submittals. The effectiveness and efficiency of the tool is as of yet unknown. Prior to its implementation of the web portal, WECC mishandled compliance related information on multiple occasions.
7	IT IS EVER CHANGING ONLY TIME WILL TELL
8	Navigating the WECC Compliance Website is confusing. It is difficult to locate documents, some are on the other WECC website. The most current document is not located where the older versions are located. For example, WECC's 2009 CMEP Implementation Plan document is not located in the section CMEP & Supporting Documents but the 2008 Plan is. The 2009 Plan document is located in the Audits and Investigations section, the 2008 Plan is there also. Still in Audits and Investigations section, I clicked on RSAWs and the drop down menu on the left changed and was now all the Reporting Forms so I was now in the Compliance Library section. I clicked on RSAWs in another area of WECCs compliance website and this time I was linked to the NERC website. Still in the Compliance Library, I clicked on FERC Orders/Rules. The most recent document there was from 2007. Under Program Documents the same document is listed as both WECC CEP and as WECC Compliance Monitoring and Enforcement Program (CMEP)
9	NERC NERC has shown substantive progress in developing e-tools and forms. NERC should work with regional entities to ensure that regional compliance programs are integrated into the compliance programs developed by the regions for NERC reliability standards. The on-line applications being developed by all the regions should act as a one-stop shop for compliance with NERC standards and the region's individual compliance requirements with its own criteria. NPCC NPCC's compliance database "CDAA" application needs to be enhanced so as to incorporate timelines and compliance requirements associated with not only the NERC reliability standards but also the NPCC regional criteria. The CDAA should be a one-stop shop for both NERC and NPCC compliance requirements and associated timelines. NPCC provides for web-based submission of comments on criteria, regional standards and directories which are in the pipeline.
10	NERC NERC uses electronic formats for compliance audit efforts and effectively manages files and reporting for the audit functions. NERC should continue to provide additional guidance to REs and entities for the format of documentation. Several audit reports have indicated that audit teams were encouraging consolodation of individual documents into one form that could be scanned and searched versus turning over a whole series of separate documents.

	Comments and recommendations:
11	NERC and RFC-The directions for filling out the forms often need more clarity. This is especially true at the regional level.
12	NERC had shown progress in developing e-tools and forms but recent changes have made submitting inputs and obtaining clear output report more difficult.
13	NERC is not directly involved in collecting compliance information. SERC has an efficient and effective electronic tools and forms for submittal of compliance information. SERC Portal has been a model in the industry., but the on-going changes may appear to be less than user friendly to a casual user. RFC Portal now resembles the SERC Portal
14	NERC's reformatted website, WECC's portal and WECC's new Compliance website are all useful improvements.
15	NERC's website has been re-structured and it is sometimes difficult to navigate due to some items being moved - without clear indication of where.
16	Periodic problems with the CDMS web site, such as not having the ability to upload or login issues
17	RFC's recent adoption of the Portal System utilized by SERC has been a significant improvement.
18	See above comments
19	So far the electronic tools we have seen (QRSAW and RSAW) contain limited information that provide any information beyond that in the standard. The QRSAW (Preaudit Questionnaire) is a good idea and the questions while not always supported by the requirements in the standard, request material in a manner that makes more sense for a review of how an organization meets the requirements. So these are attempts in the right direction. More specific information for what is being sought, especially in cases where the requirements is not clear, would be helpful. However information requested should be used, and visibly used, during the audit. The PreAudit questionnaire takes a good amount of time to fill in, and to have it not be read or used by the auditors during the audit raises questions on why it exists.
20	Software tools frequently require multiple entries for affiliated registered entities where a allowing for a single consolidated entry would much more efficient. RFC revises the self-certification / data submittal / dates due too often. More effort should be made to utilize current software. PDF format should be accepted.
21	Some of the new NERC QRSAWs are not clear, effective or efficent for submittal of compliance information.
22	Some tools and forms are better than others. NERC uses electronic forms that do not allow the marking of confidential data. The form that NERC has developed for the submittal of Requests for Interpretation is unsuitable. The MRO uses the CDMS 4.0 as its compliance tool. Some data submittals do not use this system (i.e. protection misoperations data, frequency bias data, CPS1 and CPS2) and rely on email submittals. In general, this system is not overly intuitive to use. However, the MRO usually provides clear instructions with its data requests and responds to questions promptly.
23	SPP is a party to the IRC Standards Review Comments, please refer to that submittal for our response to this question.
24	SPP website has compliance section with documents easy to find. NERC site may require more navigation to find the proper version of a required document.
25	Strongly Agree. CWL submitted all information for the 2008 Spring Compliance Audit in electronic format. This was very helpful to CWL and hopfully SPP and NERC.
26	The electronic format and program will improve as more feedback is received from registered entities using the system.
27	The electronic tools are in early stages of development and still have numerous problems as a result.
28	The NERC Alerts process concerns us because there does not apprear to be a single source for contacts, but a conglomeration of multiple lists. Our primary and alternates did not receive at least two of the advisories distributed in February. Though not a "compliance" issue, the NERC Rules of Procedure provide for the escalation to FERC if entities are not responsive to the alerts. The RFC process, with a points-of-contact, is ineffective at ensuring that all with compliance responsibilities are made aware of compliance activities in a timely manner.

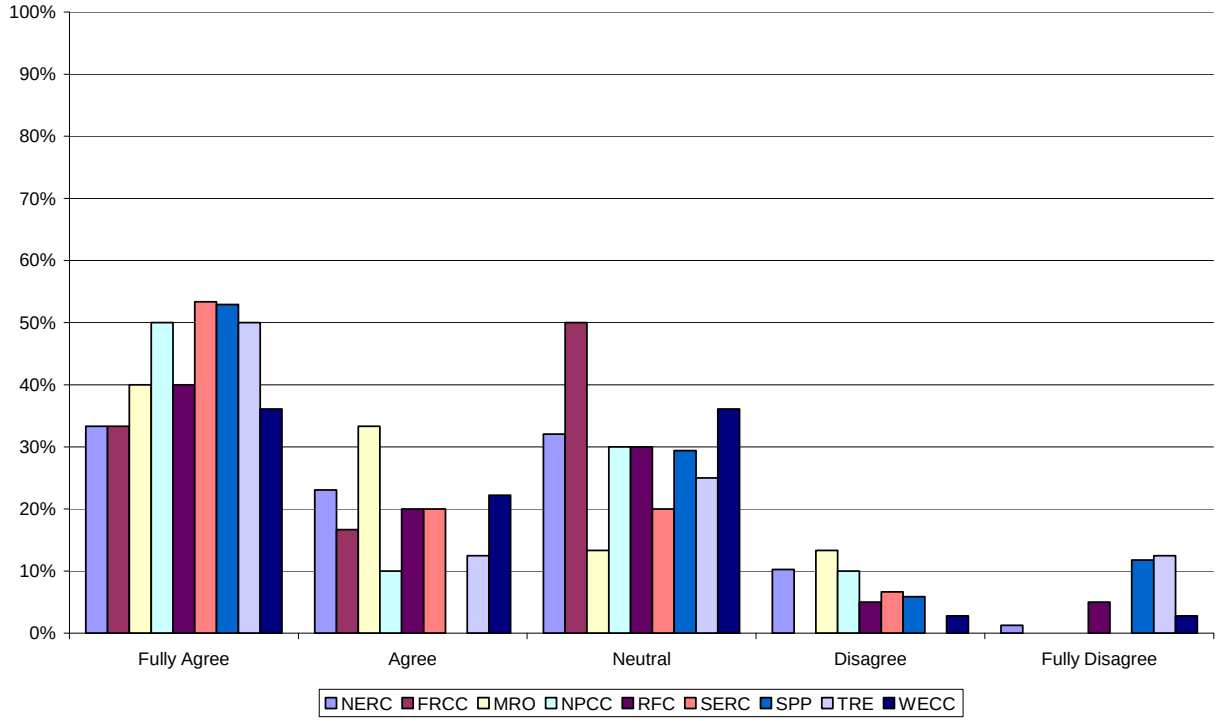
	Comments and recommendations:
29	The process of holding a NERC web cast helps the industry greatly. But we have seen that registered participants are now being asked to reschedule due to the overwhelming amout of people that want the information. Perhaps NERC should always have two sessions for each web cast or increase the amount of people who can attend.
30	The Regional Entities can improve the current process by making their processes for disseminating compliance information to Registered Entities more consistent and predictable.
31	The regions have developed electronic tools and forms to submit compliance related information. NERC should encourage consistency of tools and forms between the regions
32	The reporting of NPCC self-certifications through the CDAA application could be improved to accommodate a single registered entity reporting on behalf of multiple functions (TO,LSE,DP,etc.)
33	The RSAWs are in need of major revision. They should be a tool for industry. They aren't.
34	The TRE is slowly catching up to offer electronic tools to submit compliance information. Even with the newly launched Portal, this tool is still not available for all documents. Revisions and updates are still emailed to TRE. It doesn't seem like an efficient methodology when TRE handles many entities. Reports that entities could print themselves would be highly beneficial.
35	The WECC Portal has increased the efficiency of submittals. WECC uses NERC forms. The NERC Mitigation Plan form is cumbersome and difficult to follow.
36	The WECC Web Portal is a good baseline tool, but is still having some kinks worked out, and should have additional submittal forms to be made electronic, rather than just attachments.
37	There has been improvement with the WECC Portal implementation, but better applications should also be pursued.
38	Though NERC is not directly responsible for developing and utilizing electronic forms for compliance information, NERC does have an obligation to advocate for regional consistency.
39	Though NERC is not directly responsible for developing and utilizing electronic forms for compliance information, NERC does have an obligation to advocate for regional consistency. Exelon feels that the Regions have steadily improved their use and implementation of electronic tools and forms over the past year.
40	We would agree with this statement if not for the use of the word 'clear''. With regard to the reliability process there is little that is actually "clear''. The system is designed for use by perhaps the average of users rather than the "lowest common denominator''.
41	WECC has implemented its Compliance WEB portal, and this has been very effective in managing the vast amounts of compliance information. This tool has been well-received in the region, and besides some minor technical issues, it has made the compliance information handling much simpler. WECC Compliance Staff who administer the portal, have been very effective in industry training and technical support.
42	WECC portal is not friendly or intuitive. Self certification receipts are not part of the WECC portal and would assist the registered entity in verification of the submittal receipt.
43	WECC's new portal is becoming a very useful tool (as the bugs get worked out). It's very helpful for submitting large data sets or documents. It is also easy to navigate. The main NERC exception would be the 2009 RSAWS. In this cse, the answer would be a fully disagree. This survey was frustrating because a copy could not be saved with information entered. Since Tacoma Power routed this survey to everyone who may have a comment, it resulted in lots of wasted paper as people were forced to print out multiple copies of the survey. Also, even though they were allowed to type responses and print them, busy schedules did not often allow them to complete the survey in one sitting. It would have been very helpful to be allowed to save responses and then reopen the document and finish. It is likely, NERC would have gotten more comments had this been the case. Also, it would have facilitated answering the survey by allowing copying and pasting of responses. The ability to save completed copies of forms has been an issue at other times as well. It would be helpful to be able to save copies of forms that could be saved after being filled out even if the copy had an "unofficial" watermark embedded.

	Comments and recommendations:
44	WECC's portal has been observed to be glitchy at best. In addition, WECC's submission requirements (through the portal and only through the portal with no alternatives) is highly prejudicial against very rural entities where quality and reliable internet connections are not a sure thing. To have an exclusively online submission requirement with no provision for mailing electronic files and/or hard-copies in a secure package can be problematic. The portal they use also seems to have its fair share of glitches and bugs. This does not mix well with an environment in which sanctions can be imposed if filings and submissions are not done exactly as wanted by the RE.

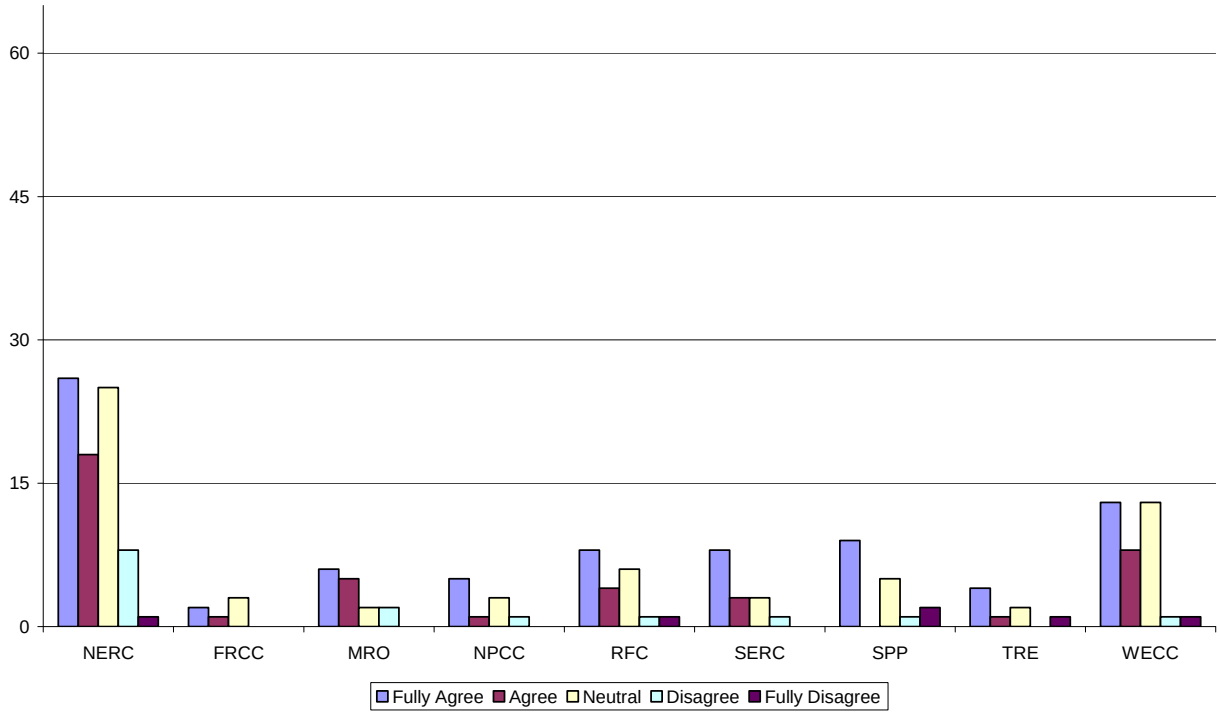
23. Provides clear options to owners, operators and users of the bulk power system to dispute alleged violations of reliability standards, proposed penalties and sanctions, proposed components of mitigation plans, and remedial action directives.

	NA – Not applicable or have no opinion	1 – Fully agree	2	3 – Neutral	4	5 – Fully Disagree	Response Count
NERC	**31.0% (35)**	23.0% (26)	15.9% (18)	22.1% (25)	7.1% (8)	0.9% (1)	113
FRCC	**85.7% (36)**	4.8% (2)	2.4% (1)	7.1% (3)	0.0% (0)	0.0% (0)	42
MRO	**70.0% (35)**	12.0% (6)	10.0% (5)	4.0% (2)	4.0% (2)	0.0% (0)	50
NPCC	**77.8% (35)**	11.1% (5)	2.2% (1)	6.7% (3)	2.2% (1)	0.0% (0)	45
RFC	**63.0% (34)**	14.8% (8)	7.4% (4)	11.1% (6)	1.9% (1)	1.9% (1)	54
SERC	**70.6% (36)**	15.7% (8)	5.9% (3)	5.9% (3)	2.0% (1)	0.0% (0)	51
SPP	**68.5% (37)**	16.7% (9)	0.0% (0)	9.3% (5)	1.9% (1)	3.7% (2)	54
TRE	**81.0% (34)**	9.5% (4)	2.4% (1)	4.8% (2)	0.0% (0)	2.4% (1)	42
WECC	**48.6% (34)**	18.6% (13)	11.4% (8)	18.6% (13)	1.4% (1)	1.4% (1)	70
					Comments and recommendations:		34
						answered question	**125**
						skipped question	**17**

ERO Survey - Compliance
Question 23



ERO Survey - Compliance
Question 23

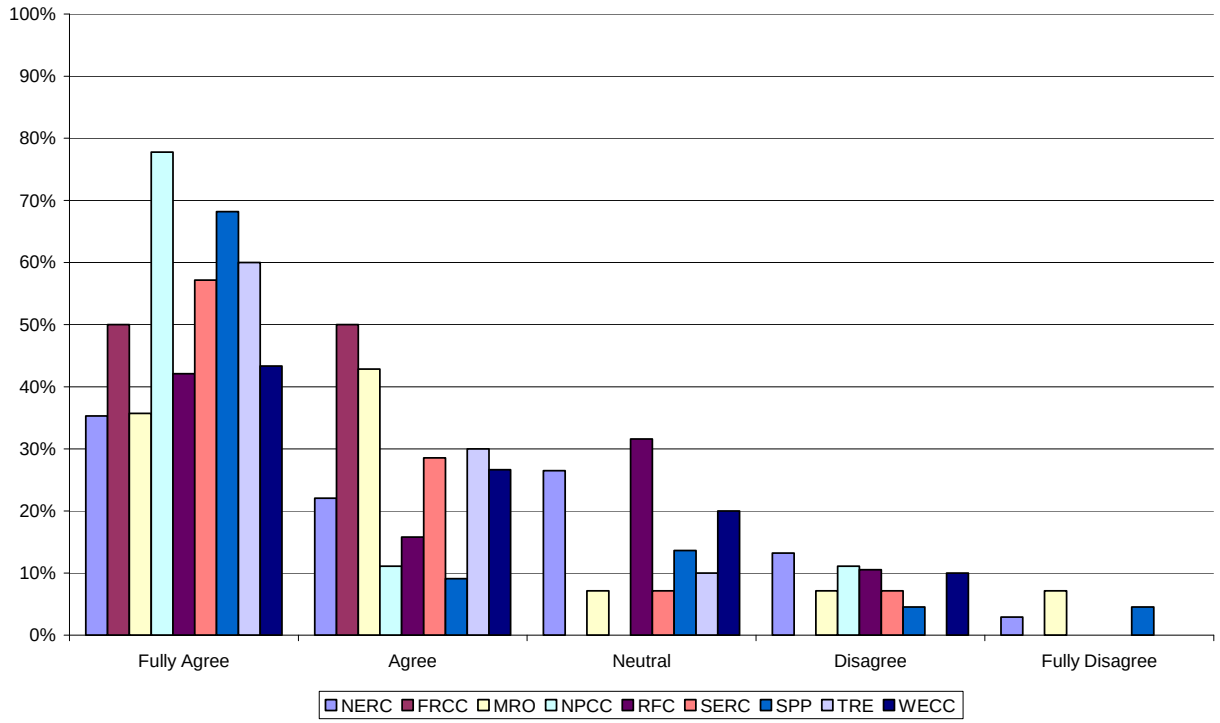


	Comments and recommendations:
1	1. It is a fear based system and difficult to actually measure. Since at this time compliance has more to do with documentation that it does "keeping the lights on", then all utilities are vulnerable to being found non-compliant. Small utilities especially can not take the risk of being oppositional and don't have the resources to do so. The best option is to be accommodating.
2	Again, CWL performed very well during our first compliance audit. We have had no issues that resulted in a violation of a reliability standard. However, I have to believe that SPP and NERC would provide clear options to registered entities to dispute alleged violations, proposed penalties, proposed components of mitigation plans and remedial action directives.
3	Compliance program is still being normalized.
4	Concern that the push toward settlement/negotiation for compliance resolution is becoming too focused on legal interpretations rather than on good utility practices and practicle impact on the BES.
5	Did not experience this
6	EEI believes that the industry has no way of knowing how NERC and the Regional Entities interact in this process, and it is not clear if the results are regionally consistent. There simply is not enough public information available to judge NERC's progress on this issue.
7	From our 2008 WECC Compliance Audit, we did not see that such options were readily available. We were not given ample opportunity to present our disagreements and point out items in evidence that should have cleared the record on several alleged violations. We are just now – 9 month after the audit – facing the Notice of Alleged Violation stage. In our opinion, there should have been an opportunity to clear these up prior to the sanction/penalty phase, at which point the Region has already firmly entrenched its position. While we did make pleas to the leader of the Audit Team and one of the WECC SME's, it appears that none of our clarifications were given any consideration.
8	If this refers to the CMEP, we believe the due process requirements are clear. We have no direct experience on implementation.
9	In regards to mitigation plans, we disagree that NERC and WECC describe or utilize a process for disputing proposed components of Mitigation Plans. To date, WECC has instructed us what to do, and has not been receptive to other potentially more efficient solutions.
10	Manitoba Hydro has a CMEP agreement with NERC and the MRO that includes options to dispute alleged violations.
11	NERC NERC and the regions have not provided public information on penalty dispute processes. The industry cannot discern outcomes or the volume of disputed alleged violations.
12	NERC The NERC Rules of Procedure (ROP) and the various sub-processes at NERC provide clear options to owners, operators and users of the bulk power system to dispute alleged violations of reliability standards, proposed penalties and sanctions. NPCC NPCC's dispute resolution processes are sufficient and provide means to dispute alleged violations of reliability standards, proposed penalties and sanctions.
13	NIPSCO is not far enough along in the Compliance Audit process to consider disputes to any roposed penalties or sanctions.
14	No audit to date
15	No Comment
16	No experience. Reserving judgment.
17	None
18	SPP is a party to the IRC Standards Review Comments, please refer to that submittal for our response to this question.
19	TANC has yet to hear WECC's final disposition of certain incidents that were self-reported eight months ago.
20	The compliance monitoring and enforcement program (CEMP) administered by NERC and the Regional Entities sufficiently define the processes which a Registered Entity may utilize to contest an alleged violation and associated sanctions.
21	The FRCC Documentation needs improvement especially on the settlement negotiation process.

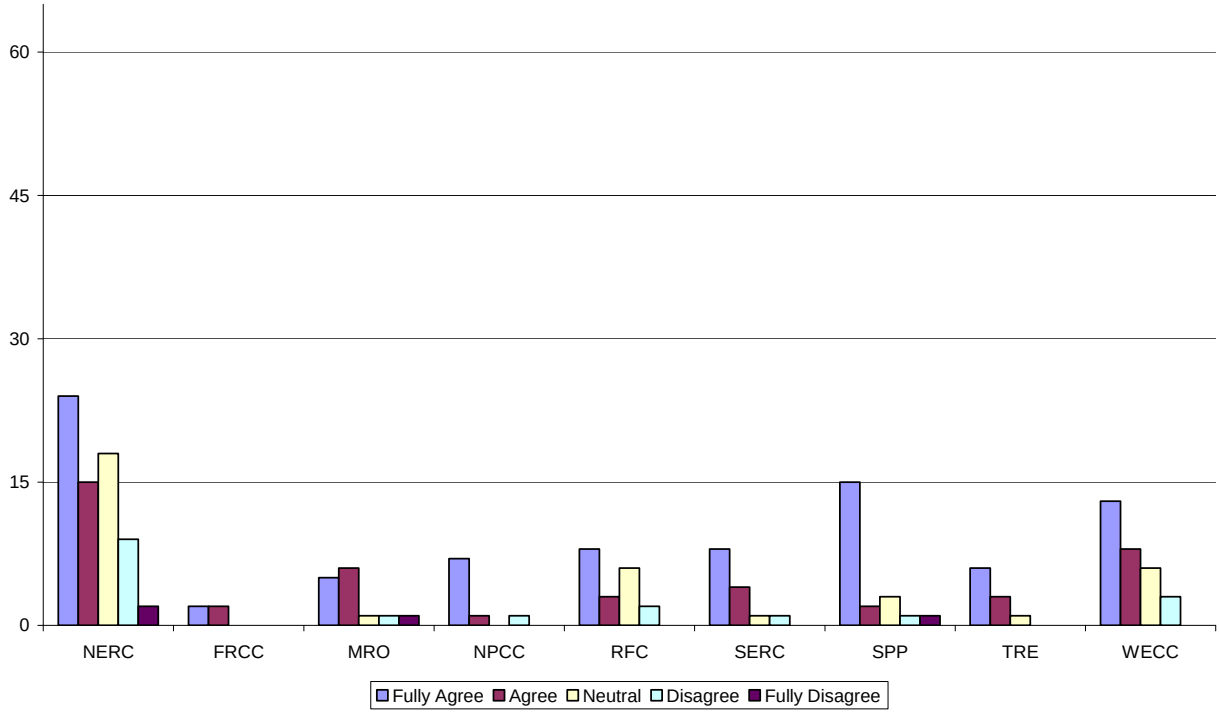
	Comments and recommendations:
22	The industry has no way of knowing how NERC and the Regions interact in this process, and it is not clear if the results are regionally consistent. There simply is not enough public information available to judge NERC's progress on this issue.
23	The industry has no way of knowing how NERC and the Regions interact in this process, and it is not clear if the results are regionally consistent. There simply is not enough public information available to judge NERC's progress on this issue.
24	The NERC Rules of Procedure (ROP) and the various sub-processes at NERC provide clear options to owners, operators and users of the bulk power system to dispute alleged violations of reliability standards, proposed penalties and sanctions.
25	The only real option in the dispute resolution process is "Settlement" - admit guilt and accept the consequences. Both NERC and the RROs appear to be afraid of being seen as soft if an entity is deemed to be not guilty of a violation.
26	The process is not transparent and so far limited statistics is available to adequately respond to this question. SERC: Limited experience.
27	The regions have developed methods to dispute alleged violations. NERC should encourage consistency of methods between the regions
28	There is not enough public information provided for AEP to respond directionally (positive or negative) to the requested assessment. This is, in itself, a problem in that it signals a lack of transparency exist in the current process.
29	This rating is based on awareness of Compliance Monitoring and Enforcment Program Plans, not on actual dispute resolution experience.
30	TOO EARLY
31	We haven't been there yet.
32	WECC has sought settlement in most instances and has a clear appeals process, as do NERC and FERC.
33	WECC's and NERC's procedures seem fairly clear on these points.
34	While we have not been party to an alleged violation, the region has developed procedures on what options are available to the registered entity.

24. Conduct of compliance inquiries and investigations by staff is professional, thorough, and efficient.							
	NA – Not applicable or have no opinion	1 – Fully agree	2	3 – Neutral	4	5 – Fully Disagree	Response Count
NERC	**39.8% (45)**	21.2% (24)	13.3% (15)	15.9% (18)	8.0% (9)	1.8% (2)	113
FRCC	**90.5% (38)**	4.8% (2)	4.8% (2)	0.0% (0)	0.0% (0)	0.0% (0)	42
MRO	**72.0% (36)**	10.0% (5)	12.0% (6)	2.0% (1)	2.0% (1)	2.0% (1)	50
NPCC	**80.0% (36)**	15.6% (7)	2.2% (1)	0.0% (0)	2.2% (1)	0.0% (0)	45
RFC	**65.5% (36)**	14.5% (8)	5.5% (3)	10.9% (6)	3.6% (2)	0.0% (0)	55
SERC	**72.5% (37)**	15.7% (8)	7.8% (4)	2.0% (1)	2.0% (1)	0.0% (0)	51
SPP	**60.7% (34)**	26.8% (15)	3.6% (2)	5.4% (3)	1.8% (1)	1.8% (1)	56
TRE	**76.2% (32)**	14.3% (6)	7.1% (3)	2.4% (1)	0.0% (0)	0.0% (0)	42
WECC	**57.1% (40)**	18.6% (13)	11.4% (8)	8.6% (6)	4.3% (3)	0.0% (0)	70
					Comments and recommendations:		30
						answered question	**126**
						skipped question	**16**

ERO Survey - Compliance
Question 24



ERO Survey - Compliance
Question 24



	Comments and recommendations:
1	Alleghney has nothing but the highest of praise for the professionalism of the staff and it is undoubtably thorough. However, the efficiency is lacking not necessarily by Staff, but in the process itself.
2	APS had a NOV 7, 2008 SOL violation: TOP-STD-007 APS was notified of a NERC investigation; NERC communication has been poor with regard to the team visit. In addition WECC is conducting an indepedent investigation over the same event. Why two investigations?
3	Compliance auditors are less focused on the intended purpose of the standard and its reliability impact and rather are more concerned about the literal use of, and compliance to, the words. The result is the auditors' disproportionate emphasis on status of compliance with administrative requirements. Focusing on administrative requirements rather than those that are truly risk-significant indicates inexperience or inadequate understanding of effective auditing principles, or lack of understanding region or market functions, or even the technical subject matter at hand. In some cases, the auditors are measuring success by the number of violations they can identify. The emphasis should be on improving reliability. The auditor and Registered Entity should realize success when an audit is completed with full compliance. Compliance auditors need to focus their attention on those standards with a high reliability impact, and whether the reliability intent of those standards is met. Unless administrative shortfalls or difference would obviously jeopardize reliability, they should be treated as recommendations for improvement rather than citations of non-compliance. NERC should emulate through the Reliability Standards Development Procedure and the Compliance Monitoring and Enforcement Program the Nuclear Regulatory Commission's oversight program, which was redesigned to focus on risk-significant topics and events. NERC should also consider modeling the Regional Entity auditing programs along the lines of the NRC program for both auditor training and the conduct of audits. Many of the reliability standard requirements are strictly administrative and have little or no direct impact on reliability. There is no distinction in the enforcement process for these administrative requirements and those that are reliability risk-significant, causing burdensome effort by both Regional Entities and Registered Entities with little reliability gain or consequences. These administrative requirements should be separated or designated as administrative and handled at a lower level than Requirements that directly affect reliability. The enforcement process should be streamlined for administrative requirements and they should be handled more like non-cited violations.
4	Compliance inquiries and investigations are taking too long and do not appear to be coordinated between the regions and NERC. An example is the 9/18/07 event in MRO where the NERC CVI is still not complete.
5	Conduct of staff is professional at all times. The NERC standards say a Region should complete its review of a system event in 6 months. Most CVIs from system events appear to take well over a year, with the involved entities not knowing what standard they might have (or may continue to be) violating. It also appears some CVI teams have upwards of 20 members.
6	Conduct of staff is professional at all times. The NERC standards state that a Region should complete its review of a system event in 6 months. Most CVIs from system events appear to take well over a year, with the involved entities not knowing what standard they might have (or may continue to be) violating. It also appears some CVI teams have upwards of 20 members which cannot be considered as an efficient use of resources.
7	EEI understands that, for the most part, compliance inquiries and investigations by NERC and Regional Entity staff have been professional and thorough but far from efficient. In compliance enforcement, it is not clear to the industry exactly where the root causes of the backlog lie. While the processes are opaque, it does appear that much work needs to be done to resolve this issue. An efficient, fair and transparent process would serve the industry's goals of improving bulk power system reliability. The current processes for both compliance enforcement and investigations is in fact becoming a hindrance as it is impeding the ability of the industry to learn from mistakes and incorporate process changes on a timely basis in support of bulk power system reliability. Both NERC and FERC formal processes for compliance inquiries and investigations are unclear and not well-defined, and in some cases don't even seem to exist. More formal procedural documentation is needed to ensure transparency, consistency and due process.

	Comments and recommendations:
8	Exelon feels that, for the most part, the compliance inquiries and investigations by NERC and regional staff have been professional and thorough but far from efficient. It is not clear to the industry stakeholders exactly where the root causes of the backlog lie. Much work needs to be done to resolve this issue. An efficient, fair and transparent process would serve the industry's goals of improving reliability. The current process is in fact becoming a hindrance as it is impeding the ability of the industry to learn from mistakes and incorporate process changes on a timely basis. NERC and FERC's formal processes for compliance inquiries and investigations are unclear and not well-defined, and in some cases don't even seem to exist. More formal procedural documentation is needed to ensure transparency, consistency and due process.
9	Investigations are not completed in a timely manner.
10	More formal procedural documentation is needed to ensure transparency, consistency and due process.
11	NERC As discussed in previous questions, the resultant backlog of pending violations is not providing viable tools in which the industry may learn from in order to improve bulk power system reliability. NERC should address the backlog more rapidly and provide additional clarity and transparency to the full process for filed violations. For instance, if an entity was alleged to have a violation, took issue with the findings, appealed the violation and whether the outcome was overturned or sustained, the industry would learn valuable compliance lessons from such events. NERC must provide additional information about the process for completed violations.
12	NERC must ensure its findings in an audit or investigation are a final determination. Since the registered entity is open to findings for violations on any approved NERC standard during the conduct of an audit, entities should have the confidence that the conclusions of the audit are a valid indication of their performance. To find a registered entity compliant at the end of an audit, and then to open an investigation of the same entity in a short time after the conclusion of the audit, raises questions about the thoroughness, and efficiency of the NERC Compliance and Enforcement Program. Registered entities incur real costs to participate in audits. Entities should not be subject to investigations and audits if already recently completed. The industry should have confidence that the findings of a compliance audit are defendable by NERC. Just as NERC expects registered entities to respect their findings, NERC should expect other regulatory bodies to respect the same findings.
13	No audit to date
14	No real experience.
15	Not applicable
16	Not Applicable - See comment under 3-4 above.
17	Participated in two on-site compliance audits, staff was professional, through and efficient.
18	SERC - Though we have a limited experience, we have found the conduct of the SERC staff professional, thorough, and efficient. RFC - Our limited experience is that the conduct by the RFC staff is professional and thorough but less than efficient. It took a period of several months to even put a CVI team together.
19	SERC has been very professional during all of its compliance inquiries and investigations. Furthermore, it appears their investigations have been thorough.
20	Spot check process is very efficient
21	Staff appears to use people with little utility experience (i.e. young engineers just out of college).
22	TANC has yet to hear WECC's final disposition of certain incidents that were self-reported eight months ago.
23	Taud Olsen is an excellent addition to WECC's Compliance Program.
24	The industry feels that, for the most part, the compliance inquiries and investigations by NERC and regional staff have been professional and thorough but far from efficient. It is not clear to the industry exactly where the root causes of the backlog lie. Much work needs to be done to resolve this issue. An efficient, fair and transparent process would serve the industry's goals of improving reliability. The current process is in fact becoming a hindrance as it is impeding the ability of the industry to learn from mistakes and incorporate process changes on a timely basis. NERC and FERC's formal processes for compliance inquiries and investigations are unclear and not well-defined, and in some cases don't even seem to exist. More formal procedural documentation is needed to ensure transparency, consistency and due process.

	Comments and recommendations:
25	The inquiry teams have been very professional and thorough. Early experience indicates that improvements to efficiency could be gained by a better understanding on behalf of the staffs and the registered entities of what evidence or documentation is sufficient to establish compliance.
26	The turnaround time is slow and the backlog continues to stifle the process. There should be expedited reviews for low value violations that have not caused harm to the Bulk Power System.
27	Throughout the entire process SPP and NERC has been very professional, thorough and efficient.
28	We cannot offer comments until we are subject to compliance inquiries and investigations.
29	WECC's conduct during one of our Compliance Investigations was professional, thorough, and efficient. On the other hand, WECC conduct during another compliance investigation was neither thorough nor efficient. From a thoroughness perspective, after minimal interaction with BPA on the matter, WECC elected to close the CVI, citing a lack of knowledge as to how to determine whether or not an entity was compliant with the requirement in question. From an efficiency standpoint, though the issue initiating the Compliance investigation was limited to a single requirement, in its data request, WECC requested documentation of BPA compliance with ALL requirements in the Standard.
30	While we believe the conduct of the staff to be professional and thorough, we can not conclude that compliance inquiries and investigations are being completed efficiently. AEP is quite concerned with what is creating the delays and backlogs of compliance violations, but does not have the visibility to point to the root problem that can help in improving reliability. However, the symptoms are eroding opportunities for the industry to learn from mistakes and getting necessary changes in place in a timely manner. While much efficiency and timeliness is expected of registered entities, it has not been sufficiently expected of the NERC and RE side of the violation processes.

25. Comments and recommendations:	
	Response Count
	31
answered question	31
skipped question	111

	Comments and recommendations:
1	#1: The execution of the compliance program seems to be promoting a legalistic and rigid focus of resources on documentation and details without an evaluation of the benefit or cost to the enhancement of the reliability of the Bulk Power System. #2. The CIP standards require a different approach from the traditional reliability standards. Compliance with the CIP standards should have a goal of assessing the effectiveness of the cyber security controls which have been implemented. The compliance approach to date identifies details but fails in the goal of assessing the overall effectiveness of the controls.
2	(1) It is important to keep focused on the larger items that have an impact on reliability and not on administrative details. (2) Unfortunately, the only time to understand the "level of performance necessary" is when an entity is audited. This lack of understanding is further exacerbated by the backlog of compliance violations that would provide the industry with a better understanding of the the documentation and evidence will need to be demonstrated. (3) AEP would suggest that for self-reported violations that have minimal or no impact on reliability, there should be no fine. Only under repeating situations or high numbers of minimal violations should NERC determine that the compliance culture of the organization is lacking and apply an appropriate fine to facilitate the necessary mitigation. (4) From an outside perspective, NERC has a black box method on how to determine the penalty of a violation. To gain transparency, the industry has asked for the tool, but NERC has declined to make the tool available. Without such knowledge, the existing ranges in the sanction guidelines are very wide and with the "per violation / per day" factor can create levels that could reach a material level threshold for public disclosure in accordance with SEC regulations. This creates a situation of unbounded financial risk risk that was clearly not intended, particularly for lesser administrative type items with minimal impacts on reliability. (5) While we believe the conduct of the staff to be professional and thorough, we can not conclude that compliance inquiries and investigations are being completed efficiently. AEP is quite concerned with what is creating the delays and backlogs of compliance violations, but does not have the visibility to point to the root problem that can help in improving reliability. However, the symptoms are eroding opportunities for the industry to learn from mistakes and getting necessary changes in place in a timely manner. (6) While much efficiency and timeliness is expected of entities, it has not been expected at the same efficiency and timeliness for the NERC and RE side of the violation processes.
3	1. NERC must address the compliance backlog 2. NERC needs take a leadership role in driving for regional consistency
4	1. Be only concerned with present and future compliance. Even egregious non-compliance in the past that didn't cause reliability problems is now irrelevant unless the entity knew of its existence and did nothing about it. Otherwise, is the entity in compliance NOW! 2. Further define bulk power system and what constitutes impact to such. 3. Fines should only be relevant to noncompliance that DID affect reliability or when known non-compliance is not property mitigated by the entity.
5	1. NERC should work with FERC and the industry stakeholders to develop a process to ensure that minor violations that are self-reported with acceptable mitigation plans are dealt with on an expedited, non-penalty basis. 2. NERC should advocate in improving regional consistency in all aspects of the compliance process. 3. Adopt a model similar to NRC which promotes a strong performance with minimal financial penalties.

	Comments and recommendations:
6	1. The compliance process focuses far too greatly on documentation and wording rather than the intent of the standard. There is too much emphasis on the wording of procedures rather than the results of the program the procedures describe. 2. Preparing for an audit involves hundreds of documents and months of work. Efforts to track the documentation on an ongoing basis are not obviously going to reduce the audit preparation effort to a reasonable level. The focus on the past by requiring the demonstration of compliance for every day over the prior three to six years is particularly burdensome and is diverting resources from performing the planning and coordination needed to improve reliability going forward.
7	1. The NERC backlog issue must be addressed 2. A system to address minor, nonthreating, violations needs to be developed. Entities taht self report and provide acceptable mitigation plans should be dealt with expeditiously and on a non-penalty basis, as long s they meet the mitigation plan. NIPSCO experience with RFC hs been very good in this regard.
8	1. WECC compliance staff seems like it is always running to catch up. Consistency and dependability should be attained sooner rather than later. 2. Sometimes WECC seems to focus on following the process for the sake of the process, rather than trying to come up with a course of action that achieves the most appropriate result. 3. WECC's use of "form letters" has resulted in their providing very confusing and frequently misleading responses. This is particularly true when WECC is working with the backlog. They often send out a letter without checking to see where the violation is at in the process.
9	1. Audited entities deserve a chance to point out items in evidence as well as their interpretation or rationale that would potentially clear up alleged violations in the early stages of the process. The Region should have an obligation to fairly consider and reply to these arguments.
10	1. NERC needs to continue to require and improve regional consistency in compliance enforcement processes.
11	1. NERC needs to continue to require and improve regional consistency in compliance enforcement processes. 2. NERC and the Regions need to provide clear readily available and accessible information on evidence of compliance and procedures for compliance enforcement processes. 3. The backlog is in itself a hindrance to reliability improvement as it prevents the industry from incorporating lessons learned into reliability processes. 4. NERC should work with FERC and the industry stakeholders to develop a "Traffic Ticket" process to ensure that minor violations that are self-reported with acceptable mitigation plans are dealt with on an expedited, non-penalty basis. 5. The NRC model provides useful insight and informative experience on a proven method to encourage strong performance with minimal monetary penalties.
12	As the AESO is subject to the reliability framework established in Alberta and the model for compliance monitoring and enforcement contained within Alberta legislation, as well as not being subject to FERC jurisdiction, no assessment has been provided for the NERC or WECC compliance monitoring and enforcement programs.
13	Basic themes – 1. NERC needs to continue to require and improve regional consistency in compliance enforcement processes. Where a registered entity operates in multiple regions, there should be one audit of that entity either using a lead regional entity or a team made up of several regional entities. 2. NERC and the Regions need to provide clear readily available and accessible information on evidence of compliance and procedures for compliance enforcement processes. 3. The backlog is in itself a hindrance to reliability improvement as it prevents the industry from incorporating lessons learned into reliability processes. 4. NERC should work with FERC and the industry stakeholders to develop a "Traffic Ticket" process to ensure that minor violations that are self-reported with acceptable mitigation plans are dealt with on an expedited basis. 5. The NRC model provides useful insight and informative experience on a proven method to encourage strong performance with minimal monetary penalties.
14	Compliance can only be effective if the standards are clear, understandable, and measurable. "Proof to the negative" often requires development of new processes and documentation that do not add to the reliability of the bulk electric system.
15	Compliance is my area. We are shooting in the dark because of a lack of direction from TRE and NERC. That's okay as long as the Audit Team understands and allows leavity in the burden of proof. Don't criticize evidence if you haven't given specific instructions as to what you want. Any financial audit has clear and specific expectations from both parties. These aren't there yet.

	Comments and recommendations:
16	EEI raises the following basic themes: 1. NERC needs to continue to require and improve regional consistency in compliance enforcement processes. 2. NERC and the Regional Entities need to provide clear, readily available, and accessible information on evidence of compliance and procedures for compliance enforcement processes. 3. The violations backlog is in itself a hindrance to improving bulk power system reliability as it prevents the industry from incorporating lessons learned into reliability processes. 4. NERC should work with FERC and the industry stakeholders to develop a process to ensure that minor violations that are self-reported with acceptable mitigation plans are dealt with on an expedited, non-penalty basis. 5. The NRC model provides useful insight and informative experience on a proven method to encourage strong performance with minimal monetary penalties. EEI has submitted written comments to NERC several times during the past year, recommending that NERC develop a comprehensive management plan for the compliance enforcement program, including goals and objectives, assignment of responsibilities, identification of critical tasks and priorities, and resource needs. The Sanctions Guidelines need to be put on the table for reconsideration. EEI strongly believes that such a plan would support a more focused effort in this critically important core NERC program.
17	In order to improve reliability and eliminate the uncertainty regarding standard industry should be given an assurance that NERC and the RROs will respond to questions within two weeks of receipt; or communicate with the entity why they cannot respond in the two week time period.
18	none
19	None
20	None
21	Please see previous comments and recommendations.
22	Recommendation 1) NERC should improve its compliance monitoring and enforcement program and focus it on reliability rather than administrative documentation and evidence. Moreover, NERC needs to distinguish violations of standards important directly to reliability of the bulk power system versus violations of standards that are administrative in nature. The CMEP should be streamlined so that violations of administrative, documentation-type standards can be processed with minimum documented evidence and without lengthy investigations or large penalties and sanctions ... just "non-cited violations" plus mitigation plans. Investigations can be reserved for the most important reliability standards, of whose violation would put the BES in jeopardy. Recomendation 2) NERC should focus attention on streamlining the VSLs and on transparency for the Penalty Matrix. Firstly, the development of VSLs should not distract from development of other elements of the reliability standards, such as the Requirements. Nor should VSLs be assigned at the sub-Requirement level. Secondly, the VSLs should be designed and work along with the penalty matrix and sanctions guidelines so that they properly deter clear violations of significant standards. Recomendations 3) NERC should work more closely together and cooperate with the Regional Entities. It is important that NERC and the Regional Entities are developing together the necessary expertise to professionally and consistently audit registered entities and process alleged violations of reliability standards. Thus, violations can be confirmed in a fair and efficient manner. Especially important is that NERC and the Regional Entities understand their respective roles and responsibilities when they are working together on a particular audit, compliance investigation or event analysis. More so, roles and responsibilities among Registered Entities, Regional Entities, NERC and the FERC should be reviewed when the Commission is also involved.
23	Recommendation(s): a) Self Certification periods should be specific and mentioned in Compliance Monitoring and Enforcement Programs (CMEP). b) Clarification should be provided for the difference between a Self Report and Exception reporting.
24	Recommendations: 1) Training and communication needs to be exressed in more plain language terms 2) The term 'bulk power system" seems to be used synonomously with Bulk Electric System, which is a defined term. Please provide a definition of bulk power system. 3) Focus of training and interpretation seems geared more towards vertically integrated utilities, generation owners/operators, tranmission owners/operators but little focus is provided to LSE/PSE/DP. Please provide more focus on those entities who are only LSE, DP or PSE.
25	See above.
26	See APPA written comments.
27	See previous comments.

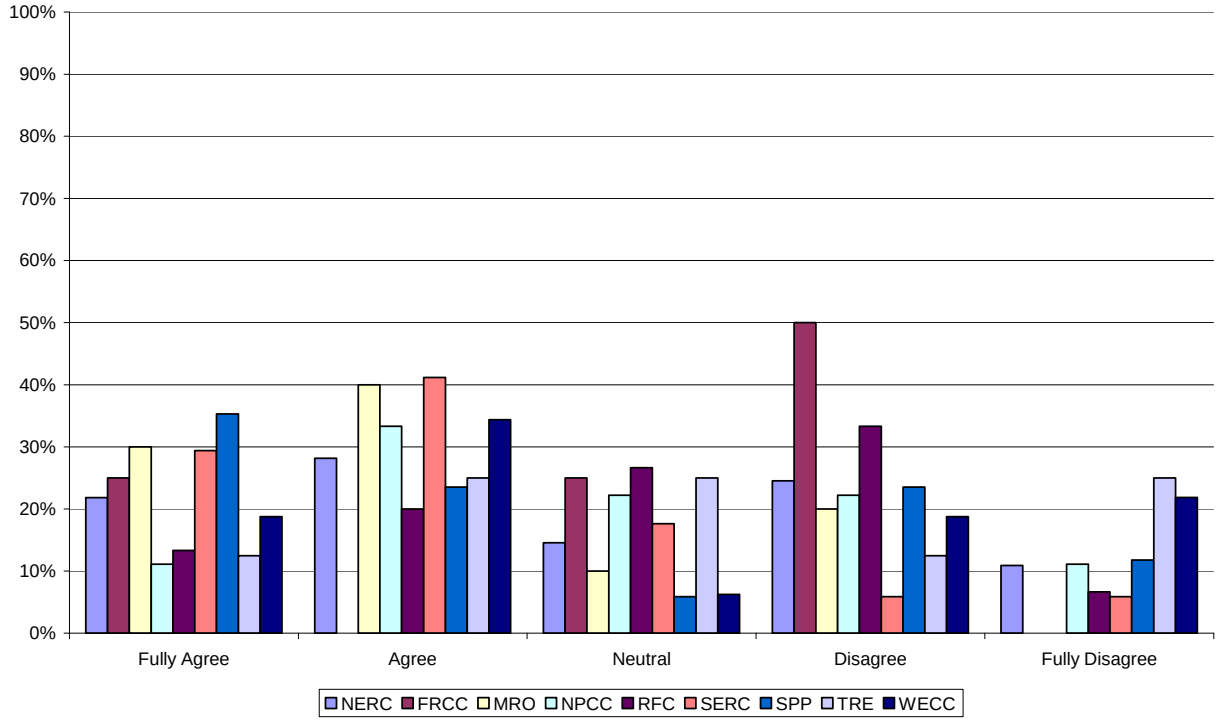
	Comments and recommendations:
28	The current audit program is based on 1. Literal word by word compliance with each requirement 2. Literal evidence & documentation that supports that compliance 3. A 3 year rotation of reviewing a large amount of this material at once 4. Self Assessment and self regulating This program does produce a body of evidence, and makes it easier to objectively quantify compliance. It however focuses entities on meet what the program tests for. That is conforming to patterns that have passed prior audits, developing process and procedure focused not on efficiency or reliability, but on conformity with the standard. The result will be uniformity and conformity, with an associated level of reliability but also limited development of new techniques or efficiency, since any action that changes an already "proven" technique encourages a risk of non compliance. This also will result in a cyclic nature, since audits are only every three years, so while a minimum level of compliance would be maintained, it would not be the level of activity seen surrounding audits. We suggest the following changes to the system.. 1. Audits would be conducted on a narrow set of related requirements & functions 2. Depending on the material, the audit may involved preaudit submittal of material and on site audit. 3. All Entities would be audited in a narrow band of time 4. The final entity audit report would include both compliance elements, identification of best practices and suggestions for improvement. 5. A region or subregion wide audit report would be released detailing overall compliance information and a summary of best practices. Instead of having one audit every three years an entity may have a year that looks like: -January: Onsite review of operator certifications and schedules for last 3 months -February: Submittal of System Operating Limit Methodology -March: Onsite review of vegetation management records -April: submittal of material relating to a particular part of the TOP standard -May: Submittal of material relating to TPL 001 -June: Submittal of line rating methodology. -July: Random spot check of line rating calculations For the TPL 1 and Conductor Rating methodology the summary report might cover how each entity performs the function. The review would cover the requirements, but on the less clear cut requirements would look at process and results rather then looking solely for evidence. This type of program would result in 1. Constant level of focus on compliance, since any material may be requested at any time. 2. Less impact on auditors and entity staff, since only small pieces would be reviewed at a time. 3. Better consistency in application of requirements since the same requirement is scrutinized for all at once. 4. Sharing of best practices to ensure reliable and efficient operation of the system.
29	There appears to be a lack of consistency and clarity in the response provided by Regional Entities regarding a Self Certification period. If possible, NERC and Regional Entities should strive to create consistency and clarity regarding the scope and time period of Self Certifications. NERC could make this time period available in the Compliance Monitoring and Enforcement Programs (CMEP). Clarification should be provided for the difference between the “Self Report” and “Exception” reporting processes. Currently, the purpose of these separate processes is not clear and seems duplicative.
30	There are no comments and/or recommendations at this time.
31	WECC should follow the procedures and timelines established in its FERC approved Compliance Monitoring and Enforcement Program. NERC should conduct a survey similar to this one, but allow the responders to remain anonymous. It is very likely that NERC would receive different answers in such a survey.

Organization Registration

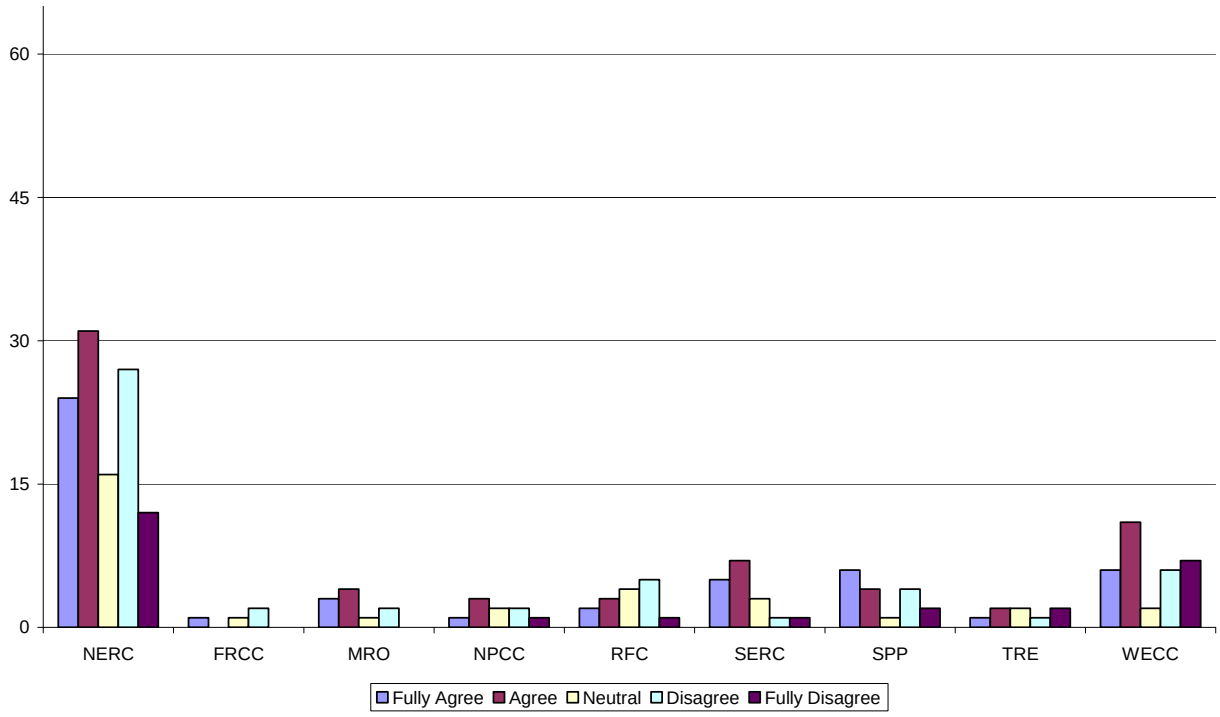
26. Has established clear and adequate criteria to determine which owners, operators, and users of the bulk power system perform certain reliability functions and should therefore be registered as responsible for complying with reliability standards applicable to those reliability functions.

	NA – Not applicable or have no opinion	1 – Fully agree	2	3 – Neutral	4	5 – Fully Disagree	Response Count
NERC	5.2% (6)	20.7% (24)	**26.7% (31)**	13.8% (16)	23.3% (27)	10.3% (12)	116
FRCC	**89.2% (33)**	2.7% (1)	0.0% (0)	2.7% (1)	5.4% (2)	0.0% (0)	37
MRO	**76.2% (32)**	7.1% (3)	9.5% (4)	2.4% (1)	4.8% (2)	0.0% (0)	42
NPCC	**76.9% (30)**	2.6% (1)	7.7% (3)	5.1% (2)	5.1% (2)	2.6% (1)	39
RFC	**68.8% (33)**	4.2% (2)	6.3% (3)	8.3% (4)	10.4% (5)	2.1% (1)	48
SERC	**63.0% (29)**	10.9% (5)	15.2% (7)	6.5% (3)	2.2% (1)	2.2% (1)	46
SPP	**62.2% (28)**	13.3% (6)	8.9% (4)	2.2% (1)	8.9% (4)	4.4% (2)	45
TRE	**78.9% (30)**	2.6% (1)	5.3% (2)	5.3% (2)	2.6% (1)	5.3% (2)	38
WECC	**44.8% (26)**	10.3% (6)	19.0% (11)	3.4% (2)	10.3% (6)	12.1% (7)	58
					Comments and recommendations:		49
						answered question	**123**
						skipped question	**19**

ERO Survey - Organization Registration
Question 26



ERO Survey - Organization Registration
Question 26



	Comments and recommendations:
1	1. Bulk power system and impact to such are not well enough defined. Small utilities can not possibly have an impact on neighboring large utilities.
2	APPA believes the functional model-based approach to the NERC compliance registry provides a sound base-line to determine the applicability of NERC standards to most entities. However, there are a number of critically important breakdowns to this procedure related to the facilities that are deemed to be part of the BPS and the fact that the assumed duties of various functional entities do not consistently map to the actual tasks performed by real organizations. First, many reliability responsibilities are reallocated by small public power utilities to joint action agencies and host BAs/TOPs. JRO procedures and Section 500 of the ROP need further development in this area. Second the line delineating where the BPS begins and ends is less clear than it first would appear and appears to differ between utilities, sometime for good operational reasons and sometimes not. For example, if UFLS and other protective relays are on the transmission side of the point of interconnection, does the DP need to register and perform UFLS? If the DP owns and paid for the step-down transformer that radially connects the DP to the BPS, must it register as a TO? The current controversy and confusion concerning the obligation of some generation owners to register and perform TO and TOP functions is a similar concern for which there is merit on both sides of the argument. In the GO/TO context, the answer may come from creation of a new functional category such as Generator Interconnection Owner/Operator. More generally, Applicability rules may need to be refined to define applicability in terms f the specific facility classes owned by the entity. In at least one region (RFC), standard drafting teams have repeatedly attempted to extent the applicability of standards to encompass generation and distribution facilities that are not currently part of the BPS and would not meet NERC compliance registry criteria to place the facility's owner/operator on the NERC compliance registry. Municipal and cooperative utilities have consistently opposed such efforts. The RFC SDTs have not supported their proposals by credible studies showing an adverse material impact on reliability of excluding such small entities and the generation and distribution faciites they own. Similar efforts were undertaken to extent the applicability of standards to include very small LSEs (e.g., 1 MW) that have no material impact on BPS reliability. Such regional differences in proposed applicability for reliability standards should not be allowed in the absence of compelling reliability impacts.
3	AS A SMALL UTILITY IT HAS BEEN OVERWELMING PUTTING ALL DATA TOGETHER AND LEARNING THE COORECT/ACCETABLE DOCUMENTS TO BE IN COMPLAINCE. THERE SHOULD BEEN MORE OF START UP PERIOD FOR SET UP, TRAINING AND FULL ENFORCEMENT WITH FINES Just needed more semairs. we all are learnig as we go includinG NERC AND RFC STAFF.
4	At a Westart sponsored SPP workshop the guidelines were clarified by SPP RE sufficiently to remove any question I still had prior to registration being completed. Specifically a question I had dealt with related to actual load connected to the Bulk system versus load connected to a distribution system related to LSE or DP registration.
5	Could improve in this area based on entity's scope, size, function.
6	Does not apply to Canadian entities.
7	EEI believes that the Functional Model is too broad and does not account for all business models and job functions of the multitude of users, owners and operators in the industry. The confusion over the functions of Distribution Providers and Load Serving Entities serves as one example, where assigning standards based on functions has led to confusion and disagreement. There is some indication that NERC is attempting to resolve these issues. For example, the new Ad Hoc Group for Requirements Pertaining to Generator Owners/Generator Operators at the Transmission Interface is a positive development that should lead to process improvement.
8	ERCOT functions don't match NERC functions in many cases. Why is ERCOT wrong? This is a mess.

	Comments and recommendations:
9	Every EPSA member is registered in the Compliance Registry. EPSA represents a significant portion of registered entities due to significant ownership and interest in ensuring reliability of the Bulk Power System (BPS). As registered entities, EPSA members have experienced significant problems with a lack of consistent application of adequate criteria for each compliance registry category. EPSA first brought its concerns about the inappropriate registration of some entities as Load Serving Entities (LSEs) and Transmission Owner (TO), Transmission Operator (TOP) & Generation Owner (GO) and Generation Operator (GOP) to NERC and the Board of Trustees Compliance Committee in October of 2007. The LSE issue, after FERC appeals is approaching a point where a reliability gap has been identified in addition to the identification of criteria that entities need to meet for the reliability of the BPS. In February 2009, following a survey, the TO/TOP&GO/GOP issue is now getting attention while questions about the TO and GO interface and criteria to establish reliability questions around that interface remain. So while the criteria has been challenged and found to be in need of refinements in both instances, entities continue to be held responsible for full compliance during lengthy resolution processes. Further, in competitive markets where retail providers do not own and operate transmission and distribution facilities, the LSE function should be modified to accurately identify and incorporate specific industry structures and entity types, or the standards and requirements that are currently tagged to "LSEs" should be reviewed to determine if the standards and requirements are within the operational control and purview of other functions.
10	For example, the CIP Standards there has been a great deal of confusion about which responsible entity that the standards apply. The functional responsibility matrix supplied by WECC lists all responsible entities as applicable, when in fact that responsibility will vary by utility and the organizational structure within the utility that owns/maintains those assets. Instructions from WECC for completing the bi-annual self-certification for CIPS has tried to address this issue, but has only led to further confusion within the industry for entities that are registered for multiple functions.
11	Here in this survey the term bulk power system is used. Are you trying to protect the bulk power system or the bulk electric system. It is not clear to me which of these systems is supposed to be protected. It is not clear what small transmission owers are to do when their current TOP tells them they are no longer their TOP. Why isn't there a TOP (light) registration option for small transmission owners?
12	It appears that many organizations rely too much on the Functional Model to determine which responsible entity(ies) they should register. The Functional Model is a general description of what tasks are required to ensure reliability, not how these tasks are performed, and logically groups these tasks by Function to be performed by a Responsible Entity. Not all listed tasks will result in a reliability standard requirement, and there can be multiple organizations that may perform some of the tasks assigned to the Responsible Entity. Hence, there is not always a one on one relationship between an organization's business model and the defined tasks for a Responsible Entity in the Functional Model. Registration should be determined on how standard requirements are written and to whom the requirement apply. It also appears that NERC avoids industry dialog in fixing problems in the registration process. Finally, the NERC RoP states that REs will have an independent appeals process for registration and certification. It appears that this provision of the RoP has not been consistently applied and regional and NERC staff make their own decision on who gets registered and must be registered.
13	More work has to be done in this area. Some of the requirements are duplicated. We need to make sure that all the gaps are covered without burdening an entity with extra documentation requirements.
14	More work needs to be done to the functional model and applicability of reliability standards to Registered Entities that operate in competitive markets and in RTOs, whereby reliability functions and tasks are jointly performed. NERC and the Regional Entities should not rely on nor require Registered Entities in RTOs to enter into a myriad of contracts, joint registrations and agreements in an attempt to adapt their roles and responsibilities to the functional model and registry criteria.
15	Neither RFC nor NERC have any ways to assure registration of ALL owners, operators, and users.
16	NERC The Functional Model is very broad, and does not account for all business models and job functions of the multitude of users, owners and operators in the industry. The confusion over the functions of Distribution Providers and Load Serving Entities is one example where assigning standards based on functions has led to confusion and disagreement. There is some indication that NERC is attempting to resolve these issues. For example, the new Ad Hoc Group for Requirements Pertaining to Generator Owners/Generator Operators at the Transmission Interface is a positive development that should lead to process improvement. NERC needs to improve the linkage between the Functional Model and the Reliability Standards.

	Comments and recommendations:
17	NERC Functional model does not fit all circumstances
18	NERC Q1: In this regard, the confusion with the LSE function has created impossible compliance issues for entities that only perform this function.
19	NERC standards are generally divided into categories based upon ownership and operation of assets, but there are other variables and overlaps. . Difficulties are encountered and confusion occurs when the functions/categories are not appropriately defined or entities are required to register for functions/categories that do not properly reflect an entity's ownership, operation or regulatory status. If certain NERC standards and requirements that are normally related to transmission operations should also be performed by operators of generating facilities, then those specific standards should be listed as elements of the Generator Owner Operator standards – rather than requiring entity registration as transmission owners or operators. In competitive markets where retail providers do not own and operate transmission and/or distribution facilities, the LSE function should be reviewed to identify and incorporate specific industry structures and entity types, or the standards and requirements that are tagged to "LSEs" should be reviewed to determine if the standards and requirements are within the operational control and purview of other reliability functions.
20	NERC- The Compliance Registry Criteria and the resulting Compliance Registry does a reasonable job of identifying entities that must comply with reliability standards. NERC and the Regions need to continue to focus on entities whose actions and facilities have a material impact on the reliability of the bulk power system. RFC- Some RFC Standard Drafting Teams (SDTs) have made efforts to expand the Criteria to include non-registered entities in the applicability section of draft standards. While SDTs may seek to extend the applicability of a reliability standard or requirement to entities that are not currently registered, the burden should be on the SDT to clearly demonstrate that there would be a material adverse impact to the reliability of the bulk power system from the failure to extend such applicability to entities not encompassed by the NERC Compliance Registry Criteria. The Compliance Registry Criteria are meant to provide certainty and to avoid having NERC and the Regional Entities waste scarce resources on entities that will not have a material impact on the reliability of the bulk power system. 2. Reliability
21	Refer to the "GO/GOP functioning as TO/TOP" issue. By the way, this question is a good example of not writing for the Customer. Please forgive, but, remember system operators are not all lawyers.
22	Registration has been very confusing. The District received an assessment from its Balancing Authority that identified how we should register. This assessment referenced WECC and NERC interpretations that only former control areas need to register as Transmission Operators. We initiated working on a delegation agreement but during this period of time our Balancing Authority changed its mind and referenced changes from NERC and WECC. Another issue is based on the extremely low thresholds identified in the registration criteria there are very small to medium size electric utilities developing process and plans that have no impact on system reliability. At best they address local customer service issues that are the jurisdiction of the local PUC's. These mandates and interpretations are being driven by FERC, and NERC and the RRO are carrying them out.
23	Registration should be determined on how standard requirements are written and to whom the requirement apply. . It also appears that NERC avoids industry dialog in fixing problems in the registration process. Finally, the NERC RoP states that REs will have an independent appeals process for registration and certification. It appears that this provision of the RoP has not been consistently applied and regional and NERC staff make their own decision on who gets registered and must be registered.
24	See comment under 2-1 above.
25	See item 1 on first page
26	Some areas of the Functional Model are still not well understood. As an example the Interchange Authority's responsibility is spread over the BA, PSE, and RC functions, with some left over for the computerized tagging system.
27	SPP is a party to the IRC Standards Review Comments, please refer to that submittal for our response to this question.

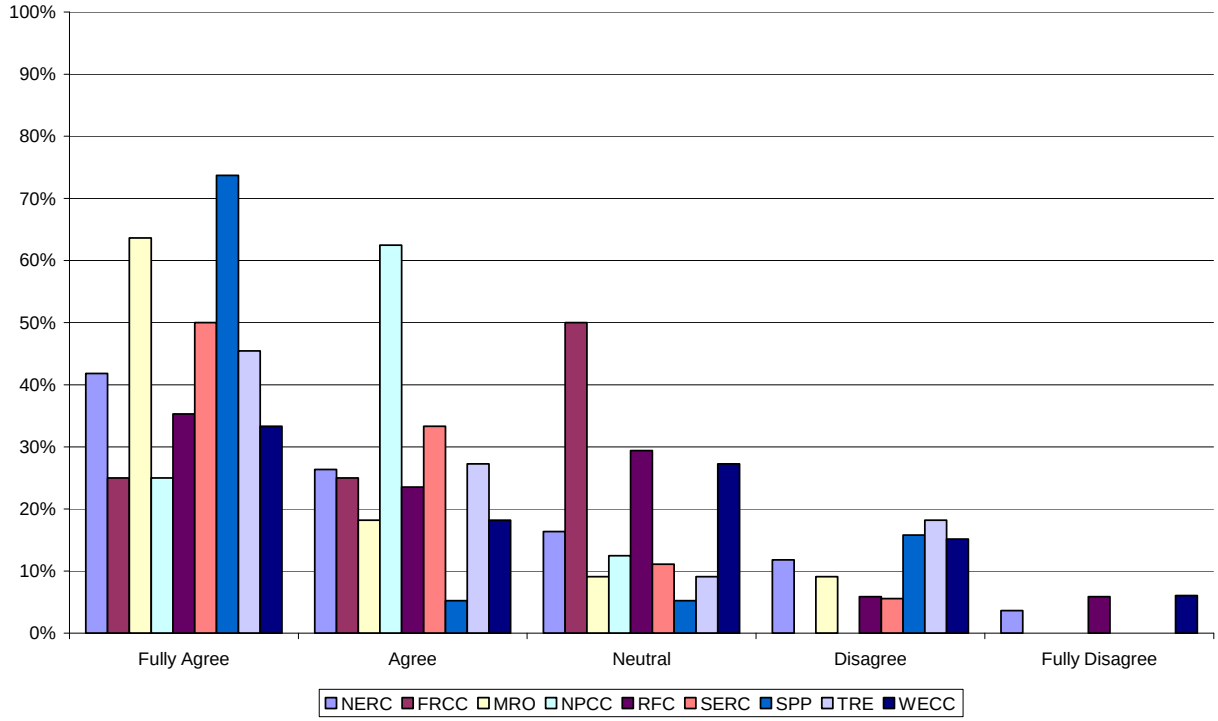
	Comments and recommendations:
28	The criteria are neither clear nor adequate and leave substantial room for interpretation. What is the bulk power system? Is it the same or different than the BES? What does it mean to be connected to the bulk electric system? Are individual homes connected to the Bulk Electric System or are interconnections at 100 kV or above considered to be connections? What if there is protection equipment such that load or generation can be isolated? What constitutes load of 25 MW or greater? Is that 25 MW restricted to a single location or the aggregation of load of differing locations, some of which are below 100 kV?
29	The Functional Model does not account for all business models and job functions of the multitude of users, owners and operators in the industry. For example, assigning of standards responsibilities based on the broad definitions of the functions of Distribution Providers and Load Serving Entities have led to confusion and disagreement. Similarly, usage of the Planning Authority and Planning Coordinator terms are not consistent. While NERC is attempting to resolve these issues, the process is slow. SERC follows NERC established criteria.
30	The functional model does not fit the way some parts of the country are organized. Therefore, TOP registrations are inconsistent.
31	The functional model does not fit well with integrated utilities. The RTO/ISO model also creates some confusion on responsible entity and the division lines of responsibility and the actual performance of the function.
32	The functional model has changed several times. Often, in discussions about registration, the biggest challenge has been to ensure everyone is using a consistent version of the model. It will be most helpful to arrive at a final set of definitions. There is still some confusion about how utilities should register (BAL standards--what are marketing responsibilities and what re reliability responsibilities). Also there is no audit for anything on the market side.
33	The Functional Model is too broad, and does not account for all business models and job functions of the multitude of users, owners and operators in the industry. The confusion over the functions of Distribution Providers and Load Serving Entities is one example where assigning standards based on functions has led to confusion and disagreement.
34	The Functional Model is too broad, and does not account for all business models and job functions of the multitude of users, owners and operators in the industry. The confusion over the functions of Distribution Providers and Load Serving Entities is one example where assigning standards based on functions has led to confusion and disagreement. There is some indication that NERC is attempting to resolve these issues. For example, the new Ad Hoc Group for Requirements Pertaining to Generator Owners/Generator Operators at the Transmission Interface is a positive development that should lead to process improvement.
35	The NERC Functional Model does not adequately account for the variety of business models utilized by owners, operators, and users of the bulk power system. It appears that there are many unnecessary redundancies regarding compliance responsibilities among registered entities.
36	The registration criteria needs additional clarity on how entities will be reviewed and assigned a specific functions. This judgement should be based on material impact of the Bulk Electric System. NERC needs to better align the their registrations criteria, Functional Model document and Reliability Standards as way to show that the correct entities are being registered in the appropriate functional designation. The alignment of these three items then must be communicated to the regional entities who should align regional standards and registration practices.
37	The registration of some GO/GOPs as a TO/TOP in the WECC Region should have been reviewed and discussed ahead of time with applicable entities to determine the proper registration approach and the Standards that reasonably apply to this situation.
38	The standards do not leave room for exceptions and is causing certain entities to register or comply with standards that do not pertain to them. IE. GO/GOP registered as a TO/TOP. To expect a small GO/GOP to comply with NERC certified operators for a feeder line and do all the training that is required from entities who are responsible for a large part of the `grid is unfair.
39	The Statement of Compliance Registry criteria have assisted parties in understanding who needs to register. The Functional Model has raised issues due to some disagreement over some functions in the model.

	Comments and recommendations:
40	There are some problems with registration and understanding what exactly the different functions mean and what entities should be included. An attempt is being made to clear up IA, but some of the others need a similar review.
41	There is a need to better define which reliability standards/requirements really need to apply to small entities (e.g., small DP, small LSE, small TO, etc.) for protecting the reliability of the BPS. A good example is the WECC "LSE/DP MOU on Compliance". A similar iniative is needed continent-wide, and needs to include the TO and TOP functions at a minimum. There is a need to direct Regional Entities to not expand the NERC Compliance Registry Criteria through the Applicability Section of a proposed region-specific reliability standard.
42	They're are still gray areas, and it seems that NERC & WECC want to take the easy way for them and implement simple criteria based on their ease of implementation and not the implication for reliability
43	This is true for the most part. We are aware of a situation where NERC registered an entity without their consent on two categories. The entity took NERC and the regional entiry to FERC over the issue.
44	TRE seems to be more stringent, including entities that meet ERCOT market definitions, but not NERC Registration Criteria.
45	We are still having a difficult time understanding how, and to what degree, we affect the bulk power system. We have not recieved clear guidance from SPP or Xcel Energy, although we have requested clarification on this matter.
46	Were clear on criteria for registration of various functions. Were open to change registration status as new and better information surfaced.
47	While standards do provide an explicit list of applicable functional entities, there are issues that arise within standards as to which entity is responsible or why the particular entity has been identified. Also, there are issues when there are shared responsibilities across multiple entities. The latest change to the NERC statement of registration criteria underscores the issues with application of requirements to the LSE function. Rather than modifying the definition, the standards and requirements need to be revisited.
48	While there have been ‘growing pains’, attempts to add granularity to the entities has always been met with resistance. Every company could have a different organizational structure and they can’t all be accommodated. I think there were 2 outstanding issues; LSEs who didn’t own physical assets and GOs who own transmission facilities. The LSE issue was resolved (at least to Dominion’s satisfaction). There is an effort to address GOs who own transmission facilities.
49	With only a few exceptions (DP vs. LSE for example), the registration process has worked very well.

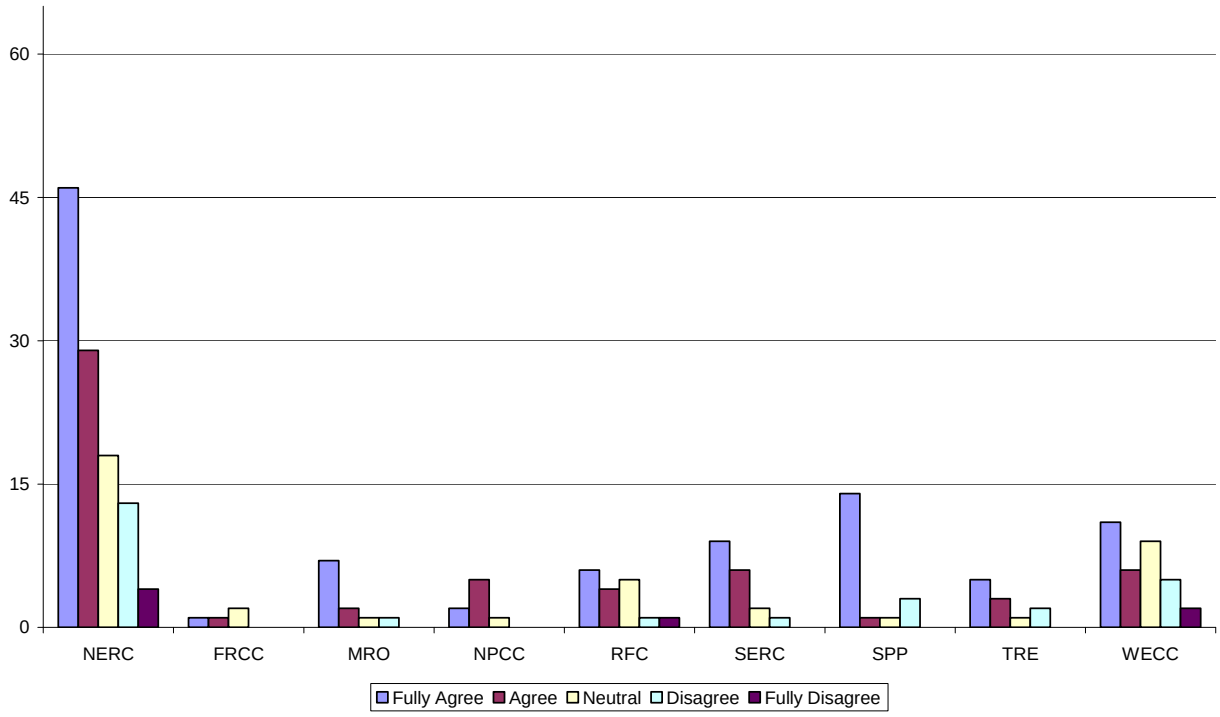
27. The registration process is an effective means of providing due notice to bulk power system owners, operators, and users that they are responsible for complying with mandatory reliability standards.

	NA – Not applicable or have no opinion	1 – Fully agree	2	3 – Neutral	4	5 – Fully Disagree	Response Count
NERC	5.2% (6)	**39.7% (46)**	25.0% (29)	15.5% (18)	11.2% (13)	3.4% (4)	116
FRCC	**89.2% (33)**	2.7% (1)	2.7% (1)	5.4% (2)	0.0% (0)	0.0% (0)	37
MRO	**73.8% (31)**	16.7% (7)	4.8% (2)	2.4% (1)	2.4% (1)	0.0% (0)	42
NPCC	**78.9% (30)**	5.3% (2)	13.2% (5)	2.6% (1)	0.0% (0)	0.0% (0)	38
RFC	**63.8% (30)**	12.8% (6)	8.5% (4)	10.6% (5)	2.1% (1)	2.1% (1)	47
SERC	**60.0% (27)**	20.0% (9)	13.3% (6)	4.4% (2)	2.2% (1)	0.0% (0)	45
SPP	**57.8% (26)**	31.1% (14)	2.2% (1)	2.2% (1)	6.7% (3)	0.0% (0)	45
TRE	**69.4% (25)**	13.9% (5)	8.3% (3)	2.8% (1)	5.6% (2)	0.0% (0)	36
WECC	**43.1% (25)**	19.0% (11)	10.3% (6)	15.5% (9)	8.6% (5)	3.4% (2)	58
						Comments and recommendations:	30
						answered question	**123**
						skipped question	**19**

ERO Survey - Organization Registration
Question 27



ERO Survey - Organization Registration
Question 27



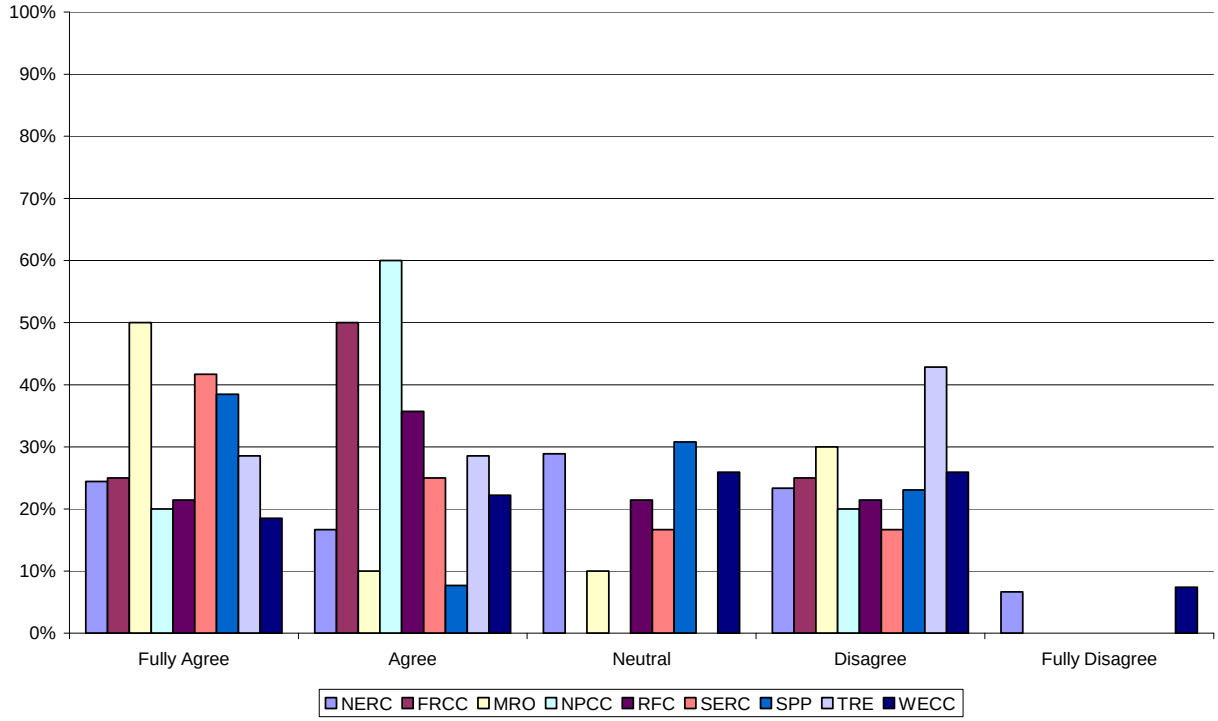
	Comments and recommendations:
1	a conflict develops when some drafting teams go outside the criteria andin doing so capture entites that have not been registered.
2	Although the official registration date has a significant bearing upon an entity's compliance obligations, TANC received no official confirming notification from NERC or WECC regarding its registration. TANC repeatedly asked WECC in writing for an indication of TANC's official registration date on the NERC compliance registry. TANC ultimately discovered its NERC determined registration date when NERC began including such dates on some of its compliance registry listings.
3	APPA supports the registration process and recognizes the complexity of modifying the criteria to address issues such as retail power marketers and transmission owning genrators. APPA members nonetheless generally believe that the registry criteria include too many small generators and LSEs/DPs that have no material impat on reliability. Additional NERC support for the WECC registration by requirement model should be encourages. APPA opposes any efforts by regions to develop their own compliance registry criiteria in the absence of compelling reasons to do so.
4	Apparently not clear to WECC or NERC inasmuch as both appear to be going beyond the registration criteria to determine which TO/TOP Requirements should apply to GO/GOPs in a one-size-fits-all manner without first identifying gaps or criteria to determine gaps first. The Board has recently established a task force to parse out the "applicable" Requirements without specifically directing the task force to first identify gaps or a criteria to determine if gaps exist.
5	Does not apply to Canadian entities.
6	If the category or function for which an entity must register is specific and applicable, there is sufficient recognition of compliance activities because these activities would be within an entity's ownership or operational control. If entities are required to register for functions for which they do not have operational control or authority to perform certain functions, then confusion may arise, as described previously.
7	It would be nice to know the audit schedule by Jan 1 of the audit year.
8	Many small entities seem to be unaware of their responsibilites.
9	NERC NERC has performed commendably in applying the sections of FPA 215 modified in order to ensure registration of users, owners and operators of the bulk power system.
10	NERC and the Regional Entities have done a good job identifying and registering users, owners and operators in the registration process.
11	NERC and the Regions have done a good job identifying and registering users, owners and operators in the registration process.
12	NERC and the Regions have done a good job identifying and registering users, owners and operators in the registration process. While this is true, many entities are reluctant to develop all the delegation agreements that are required. Most appear to prefer development of a spreadsheet with a matrix indicating 'shared' or delegated responsibilities. Examples are • GOP functions being performed by MOC (PJM primarily communicates with MOC staff instead of actual GOP) • TOP functions being performed by the utility on behalf of PJM (PJM/TO matrix) • GO functions being performed by TO (relay protection as one example)
13	NERC, working through regions, appears to have done a good job identifying and registering users, owners and operators in the registration process. SERC has administered the registration process effectively.
14	No Comment
15	None
16	See above comments
17	See page 21 comments. It is unfair and inequitable to require entities to immediately comply with the Standards upon date of registration. There should be a transition or grace period to allow the entities to come into compliance.
18	Some entities are forced to register, which eliminates the due notice period. Any lead time is spent fighting the registration, not preparing to comply. The process is too dependent upon self knowledge and self registration. No wholesale efforts by NERC or WECC have been undertaken to determine whether there are gaps in registration. Without this type of effort, it is not possible to know conclusively that all of the right parties are registered for each of the functions that they provide.

	Comments and recommendations:
19	SPP is a party to the IRC Standards Review Comments, please refer to that submittal for our response to this question.
20	Tecnical questions were sufficiently answered by SPP RE staff as to the necessary registration based upon my specific connection.
21	The registration process, although flawed as described in the above question, is the only means of providing due notice to entities that they are responsible for complying with mandatory reliability standards. It does not address notification with regard to new obligations for new standards.
22	The registration process, which still needs to be improved, remains the only means of providing due notice to entities that they are responsible for complying with mandatory reliability standards. The current issue of which TO/TOP requirements should apply to GO/GOPs that own transmission assets and/or perform TOP functions in relation to their interface with the transmission system, highlights the need to modify the registration process to permit registration by individual requirements or "packages" of requirements, based on the functions performed by the registered entities. These requirements "packages" should be determined by the various business models that entities currently employ.
23	There was initial confusion due to the lack of a "Bulk Power System" definition. The confusion has been addressed and most entities are aware of their responsibilities.
24	This has been very unclear. The registration criteria for TOP had many interpretations from NERC and WECC that were never documented in the registration criteria.
25	This question seems to be similar in nature to question 1 in the reliability standards section.
26	WAS NOT CLEAR TO VINELAND
27	We are in the process of registering a new unit. TRE did not have forms available that suited the legal design. We have been working with TRE for over two months getting forms revised, sent back via email, having TRE ask questions to NERC. This has been a disappointing and frustrating experience. TRE has only one individual who can help us so he is really busy. The registration process has a lot of room for improvement.
28	We are unsure of this. NSPI registered in 2006, again in 2007 and is now in the process of providing another update. As an integrated utility, NSPI provided several primary contacts for the functional entities within the organization, but there is no way to know what correspondence is being provided to the various areas.
29	When an entity registers as a Responsible Entity, the entity is expected to completely comply with all of the reliability functions assigned to the Responsible Entity selected. If the entity finds that there are responsibilities (functions) that are outside its scope or authority, due notice has not been provided as entities incur a compliance obligation immediately on registration even when there is a dispute about the appropriateness of the registration or even the capability of the registrant to comply . Regional Entities' registry decisions thus far have been accepted with minimal scrutiny, or application of tests for inter-regional consistency. If the category or function for which an entity must register is specific and applicable, there is sufficient recognition of compliance activities because these activities would be within an entity's ownership or operational control. If entities are required to register for functions for which they do not have operational control or remit to perform certain functions, then controversy exists as described previously. Despite discrepancies being found in the LSE case (see response to question 1 above) as it unwound, and the existence of ongoing questions regarding generator and transmission interface, the regions have continued to register entities. Until the lines of responsibility can be made clear in situations such as these, due notice, has not been sufficient.
30	While the registration process identifies who needs to comply with the NERC standards, there is no incentive for those BPS owners, operators and users not on the registration to sign-up with their region. No penalty for not being on the registration , only for those entities that are on the registration.

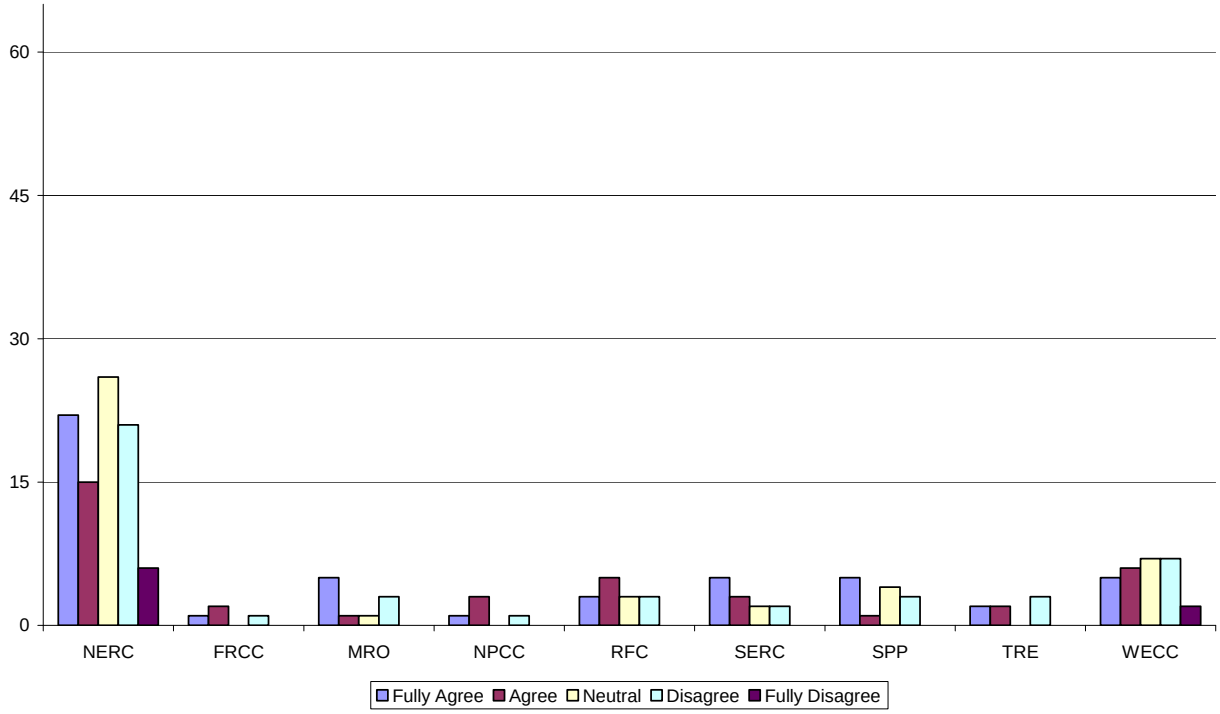
28. The registration process is effective in addressing situations in which compliance responsibilities are shared among entities, such as through the use of the Joint Registration Procedure.

	NA – Not applicable or have no opinion	1 – Fully agree	2	3 – Neutral	4	5 – Fully Disagree	Response Count
NERC	**23.1% (27)**	18.8% (22)	12.8% (15)	22.2% (26)	17.9% (21)	5.1% (6)	117
FRCC	**89.2% (33)**	2.7% (1)	5.4% (2)	0.0% (0)	2.7% (1)	0.0% (0)	37
MRO	**75.6% (31)**	12.2% (5)	2.4% (1)	2.4% (1)	7.3% (3)	0.0% (0)	41
NPCC	**86.8% (33)**	2.6% (1)	7.9% (3)	0.0% (0)	2.6% (1)	0.0% (0)	38
RFC	**68.9% (31)**	6.7% (3)	11.1% (5)	6.7% (3)	6.7% (3)	0.0% (0)	45
SERC	**72.7% (32)**	11.4% (5)	6.8% (3)	4.5% (2)	4.5% (2)	0.0% (0)	44
SPP	**72.3% (34)**	10.6% (5)	2.1% (1)	8.5% (4)	6.4% (3)	0.0% (0)	47
TRE	**81.1% (30)**	5.4% (2)	5.4% (2)	0.0% (0)	8.1% (3)	0.0% (0)	37
WECC	**56.5% (35)**	8.1% (5)	9.7% (6)	11.3% (7)	11.3% (7)	3.2% (2)	62
					Comments and recommendations:		33
						answered question	**123**
						skipped question	**19**

ERO Survey - Organization Registration
Question 28



ERO Survey - Organization Registration
Question 28

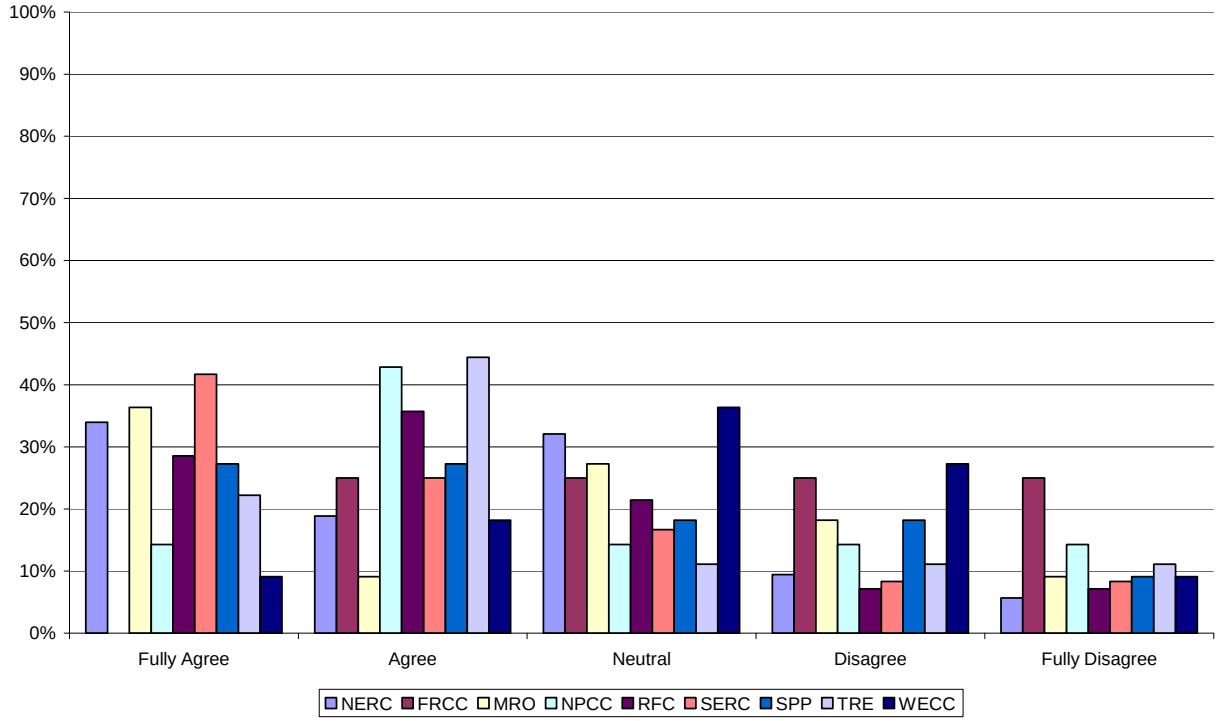


	Comments and recommendations:
1	Does not apply to Canadian entities.
2	EEI understands that this issue does not generally apply to investor-owned companies.
3	It is effective but slow.
4	Joint registration procedure may not offer the most effective means of resolving overlapping compliance responsibilities
5	Joint Registration Procedure needs to be communicated to parties.
6	Joint Registration tries to fit everyone into the square hole. We all have differeing organizational structures and responsibilities. There is no such thing as a "cookie cutter utility". Defining reliabity standards is one thing. Defining our business models is another.
7	Many of the Transmission Operator requirements are not relevant for a TOP that is not a Balancing Authority. This is also the case with other functions. This issue needs attention, with a limited amount of resources we should be prioritizing efforts that create the most benefit in supporting electric system reliability. Rather than a shotgun approach that has distribution and sub-transmission electric utilities using the same approach as the large transmission owners. Again we believe most of this one size fits all approach is driven by FERC. NERC and the RROs are following orders.
8	Many times WECC will send out nasty letters in whole to a group of entities (e.g. GOs, GOPs) and will not discriminate based on those entities that are compliant and those that are not. For example, when NERC wanted alert contact info, we responded quickly and completely to WECCs request to provide it. Subsequently, due to the fact that some entities had not provided the info, WECC sent out notes in whole to all GOs that they should have provided this alert information months previously and that the letter they were now sending was a reminder to complete it (this was done twice). It is frustrating when you have to once again prove to them that you were compliant.
9	More clarification is needed in the responsibilities with joint owners and joint-action agencies.
10	More work needs to be done to the functional model and applicability of reliability standards to registered entities that operate in competitive markets and in RTOs, whereby reliability functions are jointly performed.
11	NERC Q3: Joint Registration Process does not go far enough to allow entities to share responsibilites for a requirement.
12	NIPSCO experience with the JRO, with the Midwest ISO, was favorable.
13	No comment
14	No joint registration procedure was necessary
15	None
16	See comment in question 2
17	SPP is a party to the IRC Standards Review Comments, please refer to that submittal for our response to this question.
18	TANC believes that there are considerable overlapping responsibilities according to current registrations on the NERC compliance registry. In Paragraph 145 of its Order No. 693 issued March 16, 2007, FERC directed the ERO to “assure that there is clarity in the assigning responsibility and that there are no gaps or unnecessary redundancies with regard to the entity or entities responsible for compliance with the Requirements of each relevant Reliability Standard.” Joint registration may be part of the solution to the currently existing unnecessary redundancies, but TANC believes that NERC (as the ERO) and WECC have not adequately informed their constituents of this registration option. Additionally, since the facilities and services that presumably underlie an entity’s functional registrations are not identified in their registrations, it is not apparent how NERC and regional entities can effectively delineate the compliance responsibilities of the registered entities.
19	The joint registration procedure is becoming increasingly confusing and administatively burdensome, especially with regard RTO membership, joint owenship of plant or even members of generation and transmission cooperatives.
20	The joint registration process is not clear. Neither NERC nor the regional entity has provided much guidance on criteria for joint registration.
21	The JRO process is cumbersome. There doesn't seem to be a good way to bifurcate responsibilities under the Functional Model.

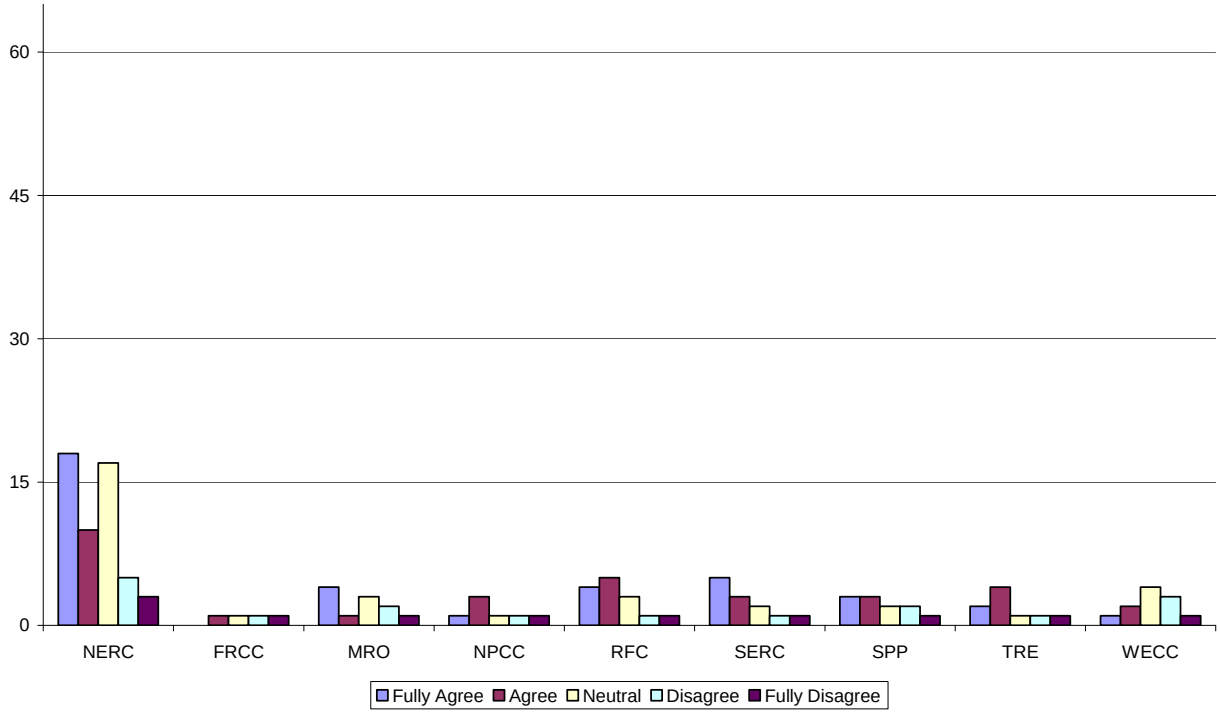
	Comments and recommendations:
22	The lower rating is a result of our experience in joint registration with our RTO (MISO) for the BA function. In this case the delineation of duties is not clear. We also believe that registration of RTO as a TOP for the entire foot print may leave some gaps in reliability if the local entities do not register as having any TOP responsibilities.
23	The NERC Rules of Procedure should include an alternative registration processes for those situations where compliance responsibilities are shared among entities agreement and where formation of a JRO is not required.
24	The registration criteria/process appears to adequately accommodate situations where responsibilities are shared among entities.
25	The registration process has not always been effective in addressing shared compliance responsibilities. Shared and delegated compliance responsibilities often require contracts between parties. The NERC process should allow for parties to establish those contracts. When joint registration is required, if one entity becomes registered, and the other is not, the regional entity or NERC, unwittingly provides one party with negotiating leverage over the other. NERC's appropriate role with joint registrations should be as an arbiter. In addition, in some circumstances, several parties are registered to perform one function with the potential for confusion on the part of other parties with an obligation to report to such a party. For example the RTOs are typically registered as Transmission Operators. In some but not all cases, the Transmission Owner is also registered as a Transmission Operator. Therefore for entities such as Generators that have an obligation to report certain information to Transmission Operators, it is not always clear if the same information must be reported to multiple parties.
26	There is a burden for Registered Entities to be registered in multiple regions. If all Regions are to be simular in the Compliance Audit processes, then why can't Regions supple each other with findings from audits. This is one area that could be stream lined to make it more efficient. There are companies that are registered in several Regions. They could be audited every year. Showing the same information to different Regional audit teams. Human natur will come into play and different regions may look at the entities compliance information differently. An entity registered in multiple regions needs to have a LEAD region that conducts all compliance self certifications and face to face aduits. The LEAD region should then have the responsibility to pass on the compliance information to the "other" regions as required.
27	There was initial confusion within the industry on how delegated compliance responsibilities would be handled by parties. The Statement of Compliance Registry criteria has aided registered entities in addressing this issue.
28	Unfortunately, joint responsibilities are still of concern from the legal and reliability compliance standpoint. NERC should look into joint agreement requirements to avoid confusion.
29	We agree that NERC has made progress in this area. The joint registration procedure is effective in addressing situations in which compliance responsibilities are shared among entities.
30	We agree that NERC has made progress in this area. The joint registration procedure is effective in addressing situations in which compliance responsibilities are shared among entities.
31	We understand that this is an evolving process, however, there is currently little guidance on this issue.
32	What is less clear is whether there should be a JRO or individual registration, some cases seem to require another method.
33	While joint registration may be appropriate for entities that have pre-existing contractual arrangements with one another that allocate responsibility for reliability compliance, it is not necessarily the best option for allocating reliability responsibilities among parties without such standing contractual relationships. In cases where parties are required by NERC or the Regional Entities to share reliability responsibilities, NERC and the Regional Entities should consider whether the Registered Entity is capable of performing those obligations. For instance, NERC should not force Registered Entities to bear responsibility for reliability standards for which they do not have the necessary operational control or legal authority to perform the necessary reliability functions.

29. The registration process is effective for registered entities performing functions across more than one region.							
	NA – Not applicable or have no opinion	1 – Fully agree	2	3 – Neutral	4	5 – Fully Disagree	Response Count
NERC	**54.3% (63)**	15.5% (18)	8.6% (10)	14.7% (17)	4.3% (5)	2.6% (3)	116
FRCC	**89.2% (33)**	0.0% (0)	2.7% (1)	2.7% (1)	2.7% (1)	2.7% (1)	37
MRO	**73.8% (31)**	9.5% (4)	2.4% (1)	7.1% (3)	4.8% (2)	2.4% (1)	42
NPCC	**82.1% (32)**	2.6% (1)	7.7% (3)	2.6% (1)	2.6% (1)	2.6% (1)	39
RFC	**68.9% (31)**	8.9% (4)	11.1% (5)	6.7% (3)	2.2% (1)	2.2% (1)	45
SERC	**72.7% (32)**	11.4% (5)	6.8% (3)	4.5% (2)	2.3% (1)	2.3% (1)	44
SPP	**75.0% (33)**	6.8% (3)	6.8% (3)	4.5% (2)	4.5% (2)	2.3% (1)	44
TRE	**75.7% (28)**	5.4% (2)	10.8% (4)	2.7% (1)	2.7% (1)	2.7% (1)	37
WECC	**82.0% (50)**	1.6% (1)	3.3% (2)	6.6% (4)	4.9% (3)	1.6% (1)	61
					Comments and recommendations:		25
						answered question	**124**
						skipped question	**18**

ERO Survey - Organization Registration
Question 29



ERO Survey - Organization Registration
Question 29

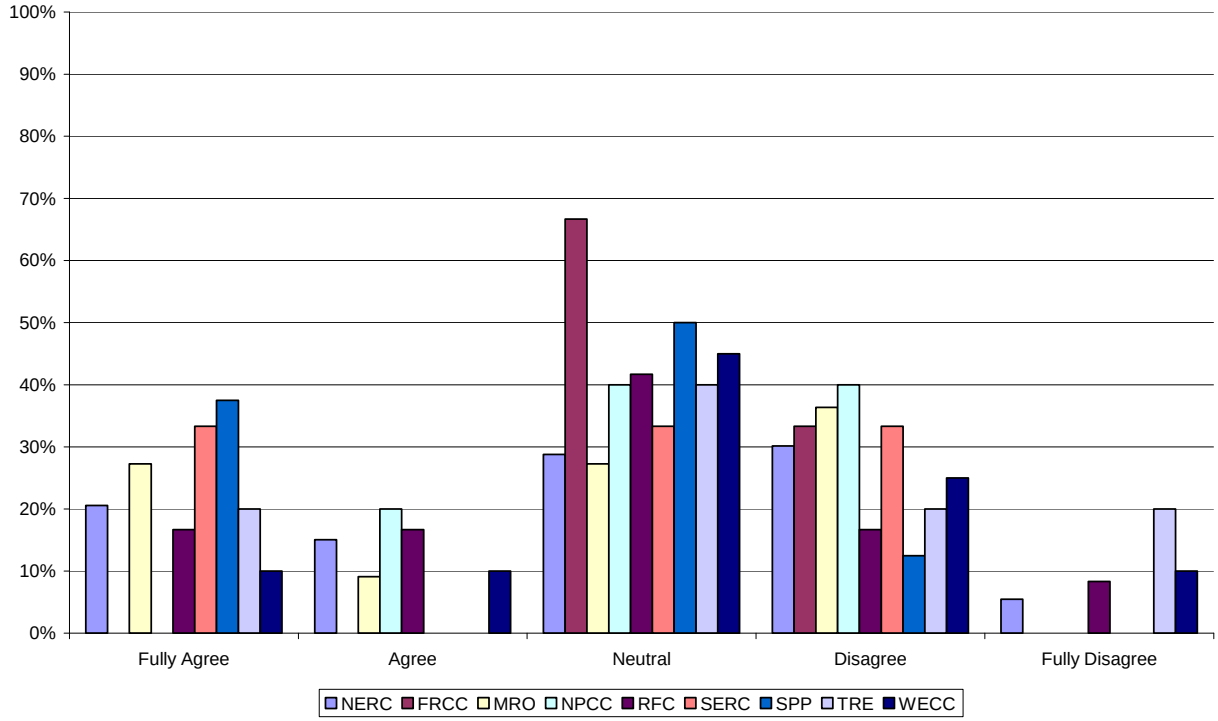


	Comments and recommendations:
1	As a registered entity that performs functions across more than one region, Exelon feels that the registration process is straightforward and not overly burdensome.
2	Does not apply to Canadian entities.
3	EEI believes that the registration process is straightforward and not overly burdensome.
4	If the category or function for which an entity must register is specific and applicable, there is sufficient recognition of compliance activities because these activities would be within an entity's ownership or operational control. If entities are required to register for functions for which they do not have operational control or authority to perform certain functions, then uncertainty may arise as described previously.
5	It needs to be more centralized. For example, the changing of a company's name should not require an entity to check with all the REs and NERC.
6	Many EPSA members have found the registration process inefficient as similar assets and/or business operations are registered differently from one region to another due to the region's interpretation of the reliability functions assigned to a particular Responsible Entity.
7	No Comment
8	None
9	Not applicable
10	Not Applicable- Lompoc does not perform functions across more than one region.
11	NRECA supports the continuing efforts of the Regional Entities Registration Working Group (RWG), NERC Organization Registration and Certification Staff, and the Organization Registration Certification Subcommittee (ORCS) to establish an approach for entities that are operating in more than one Region that would eliminate the need to submit information (compliance audits, surveys, data etc.) to multiple REs.
12	Registering in each region seems a bit redundent. We are registered as the same function in all regions, there should be a way to uniform this and have only one registration process for entities like ourselves.
13	Registration inconsistencies continue betwewen, but are beeing slowly addressed.
14	SPP is a party to the IRC Standards Review Comments, please refer to that submittal for our response to this question.
15	The forms need to be standardized across all regions.
16	The JRO process that NIPSCO participated in with the Midwest ISO had a very coordinated effort across the various regions involved.
17	The process is effective in getting entities registered in more than one region. Often though the requirement to register in more than one region is poorly defined or justified.
18	The process would benefit from creating linkages across the regions.
19	The registration process though not efficient is effective for registered entities performing functions across more than one region.
20	The registration process though not efficient is effective for registered entities performing functions across more than one region.
21	We are in only one region
22	We are specifically within the SPP region
23	We commend NERC's decision made in regards to combining all registered PSEs across more than one region to register as one entity.
24	We do not have experience in this area to judge effectiveness.
25	WECC's registration criteria does not align with that of adjacent regions. NERC is remiss to allow this.

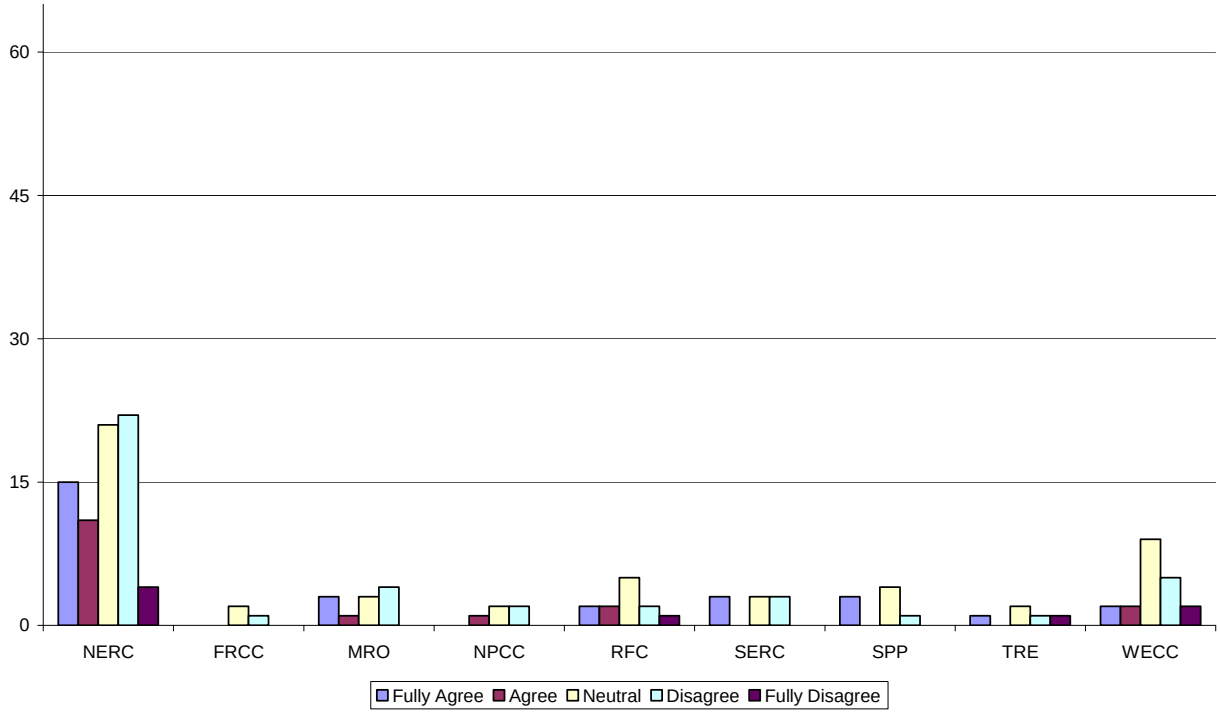
30. The registration process is effective for addressing joint registration by entities with shared or delegated compliance responsibilities.

	NA – Not applicable or have no opinion	1 – Fully agree	2	3 – Neutral	4	5 – Fully Disagree	Response Count
NERC	**35.4% (40)**	13.3% (15)	9.7% (11)	18.6% (21)	19.5% (22)	3.5% (4)	113
FRCC	**91.7% (33)**	0.0% (0)	0.0% (0)	5.6% (2)	2.8% (1)	0.0% (0)	36
MRO	**73.8% (31)**	7.1% (3)	2.4% (1)	7.1% (3)	9.5% (4)	0.0% (0)	42
NPCC	**86.8% (33)**	0.0% (0)	2.6% (1)	5.3% (2)	5.3% (2)	0.0% (0)	38
RFC	**73.9% (34)**	4.3% (2)	4.3% (2)	10.9% (5)	4.3% (2)	2.2% (1)	46
SERC	**80.0% (36)**	6.7% (3)	0.0% (0)	6.7% (3)	6.7% (3)	0.0% (0)	45
SPP	**81.8% (36)**	6.8% (3)	0.0% (0)	9.1% (4)	2.3% (1)	0.0% (0)	44
TRE	**86.1% (31)**	2.8% (1)	0.0% (0)	5.6% (2)	2.8% (1)	2.8% (1)	36
WECC	**66.7% (40)**	3.3% (2)	3.3% (2)	15.0% (9)	8.3% (5)	3.3% (2)	60
					Comments and recommendations:		28
						answered question	**122**
						skipped question	**20**

ERO Survey - Organization Registration
Question 30



ERO Survey - Organization Registration
Question 30



	Comments and recommendations:
1	Because of the impacts of standards violations, delegation is difficult to get agreement on. Even when it is delegation based on traditional operational relationships between entities.
2	Communication took place with NCR 01110 KMEA as to our requirements under SPP registration process.
3	Does not apply to Canadian entities.
4	Exelon feels that entities with shared or delegated compliance responsibilities should be allowed to work out formal agreements that fit their particular business arrangements, as long as the responsibility for compliance is clearly defined.
5	More work needs to be done to the functional model and applicability of reliability standards to registered entities that operate in competitive markets and in RTOs, whereby reliability functions are jointly performed.
6	NERC NERC needs to address the multiplicity of registration by entities as it relates to the Functional Model. Holding companies for instance have varying registration methods in order to meet the registration and Functional Model criteria. The Balancing Authority function for instance is an example of routine dissentions among companies on which portion of a vertically integrated utility should be registering as the BA. NERC should work toward consolidation of these issues related to the registration process and Functional Model requirements in a way that clarifies which portion of an integrated organization is should be most suitably registered.
7	NERC Q5: Joint Registration Process does not go far enough to allow entities to share responsibilites for a requirement.
8	NERC should look at registration by Requirement where there is joint registration.
9	NERCs joint registration process for entities with shared or delegated compliance responsibilities has worked well for joint action agencies and their members and, we believe, for G&T coops and their members. These were the types of entities that originally proposed joint registrations. Since the joint registration process was developed, other entities, such as RTOs and their members, have also used joint registration. We are concerned that there is a move afoot to change the joint registration process to better accommodate RTOs and their members and that such changes could have a negative impact on this process for joint action agencies and their members. If NERC makes an effort in the future to differentiate between different types of joint registration, it should be done in a way that accommodates all of the types of entities that use joint registration.
10	None
11	Not applicable
12	Not Applicable - Lompoc does not have any shared or delegated responsibilities with others.
13	sEE ANS Q2
14	See comment in question 2
15	See comments to #3
16	See Question 3.
17	SPP is a party to the IRC Standards Review Comments, please refer to that submittal for our response to this question.
18	TANC believes that there are considerable overlapping responsibilities according to current registrations on the NERC compliance registry. In Paragraph 145 of its Order No. 693 issued March 16, 2007, FERC directed the ERO to “assure that there is clarity in the assigning responsibility and that there are no gaps or unnecessary redundancies with regard to the entity or entities responsible for compliance with the Requirements of each relevant Reliability Standard.” Joint registration may be part of the solution to the currently existing unnecessary redundancies, but TANC believes that NERC (as the ERO) and WECC have not adequately informed their constituents of this registration option. Additionally, since the facilities and services that presumably underlie an entity’s functional registrations are not identified in their registrations, it is not apparent how NERC and regional entities can effectively delineate the compliance responsibilities of the registered entities.
19	The JRO process is cumbersome. There doesn't seem to be a good way to bifurcate responsibilities under the Functional Model.

	Comments and recommendations:
20	The JRO registration cleans things up for NERC and the MRO processes but doesn't help sort out the issues between the entities within a JRO such as financial and compliance equity.
21	The lower rating is a result of our experience in joint registration with our RTO (MISO) for the BA function. In this case the delineation of duties is not clear. We also believe that registration of RTO as a TOP for the entire foot print may leave some gaps in reliability if the local entities do not register as having any TOP responsibilities.
22	The model has provided a good basis for sitting down with neighboring BA's and cogenerators and identifying responsibilities.
23	The recent JRP finding has provided clarity for the process, as does the latest version of the Statement of Compliance Registry Criteria.
24	The registration process as currently written in the NERC Rules of Procedure Section 500 addresses joint registration by entities that share or delegate compliance responsibilities as the formation of a joint Registration Organization (JRO). However, as stated in our response to question 3 of section 4 above, the NERC Rules of Procedure should include alternative registration processes in addition to forming a JRO for situations were compliance responsibilities are shared and a JRO is not required.
25	We understand that this is an evolving process, however, there is currently little guidance on this issue.
26	While joint registration may be appropriate for entities that have pre-existing contractual arrangements with one another that allocate responsibility for reliability compliance, it is not necessarily the best option for allocating reliability responsibilities among parties without such standing contractual relationships. In cases where parties are required by NERC or the Regional Entities to share reliability responsibilities, NERC and the Regional Entities should consider whether the Registered Entity is capable of performing those obligations. For instance, NERC should not force Registered Entities to bear responsibility for reliability standards for which they do not have the necessary operational control or legal authority to perform the necessary reliability functions.
27	While the process allows for JRO sharing of responsibilities, the process should be modified since currently the assignment can only be done when all parties have registered for the same function. This makes it difficult for entities which register for different functions but have to work together on some of the common overlapping functions.
28	While the process allows for JRO sharing of responsibilities, the process should be modified since currently the assignment can only be done when all parties have registered for the same function. This makes it difficult for entities which register for different functions but have to work together on some of the common overlapping functions.

31. Comments and recommendations:	
	Response Count
	13
answered question	13
skipped question	129

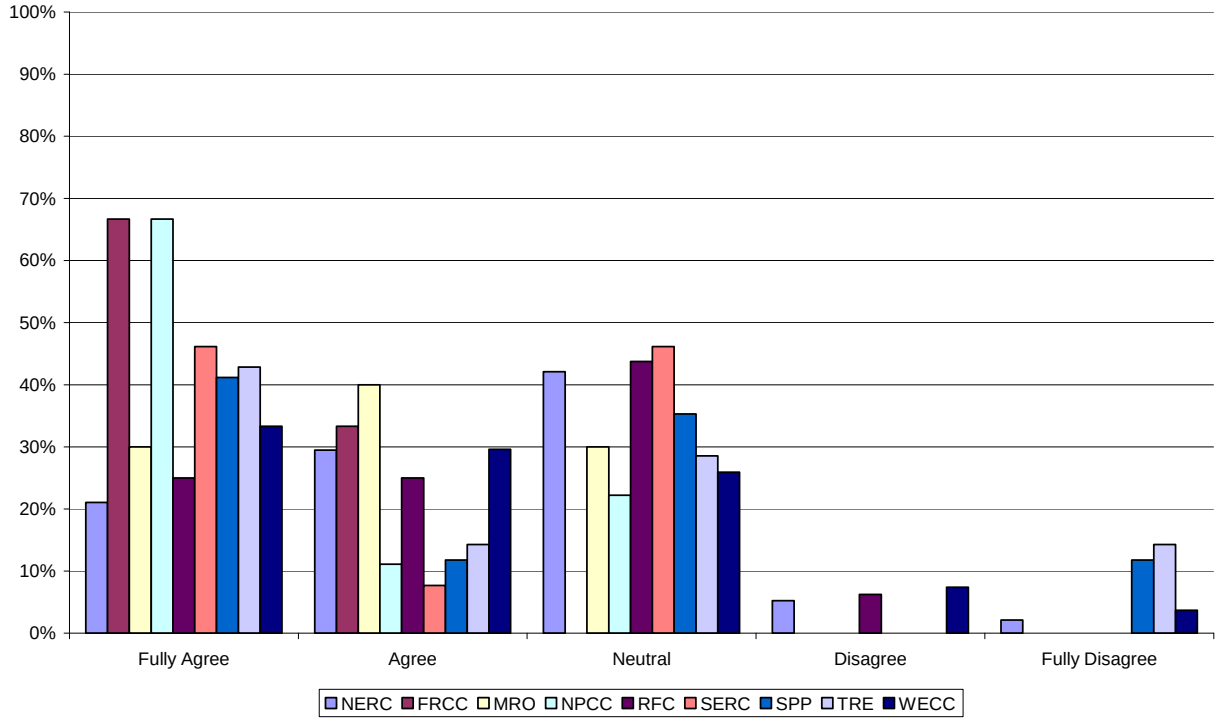
	Comments and recommendations:
1	1. Why is their a need to register in multiple regions? (ATC is registered in both the MRO and RFC region) What is the regulatory benefit for multiple registration? (Example: ATC has to perform approximately 88 self-certifications every year (44 to both regional entities), and this does not include data requests that occur during the year. 2. NERC needs to work with stakeholders to develop a more appropriate methodology for determining registration criteria based on material impact to the bulk electric system. 3. NERC needs to work with stakeholders to develop a formal process for requesting and receiving exemptions to specific standards and requirements.
2	Allow parties to develop a matrix assigning responsibilities for specific requirements in lieu of what appears to be very formal procedures contained in Rules of Procedure of the North American Electric Reliability Corporation at section 507.
3	As the AESO is subject to the reliability framework established in Alberta and the model for compliance monitoring and enforcement contained within Alberta legislation, as well as not being subject to FERC jurisdiction, no assessment has been provided for the NERC or WECC registration section.
4	NERC should conduct a survey similar to this one, but allow the responders to remain anonymous. It is very likely that NERC would receive different answers in such a survey.
5	none
6	None
7	None
8	None
9	Please see previous comments and recommendations.
10	Recomendation 1) NERC should simplify and resolve its Functional Model so that it is clear and makes sense in that what follows from it, the functional compliance registry criteria and the applicability of the reliability standards, contains no reliability gaps or overlaps. It is especially important that NERC explicitly address the functional entities that form the reliability model within RTOs.
11	See individual comments.
12	There are no comments and/or recommendations at this time.
13	When new entities are originated forms must be made to accommate needs. When TRE has only one resource to handle all entities within ERCOT, the process becomes draining and ill effective. There is no database from which you can choose a form. Turn around time is never faster than three weeks. In todays business, that is a waste of time, energy, money, and resources.

Reliability Assessment

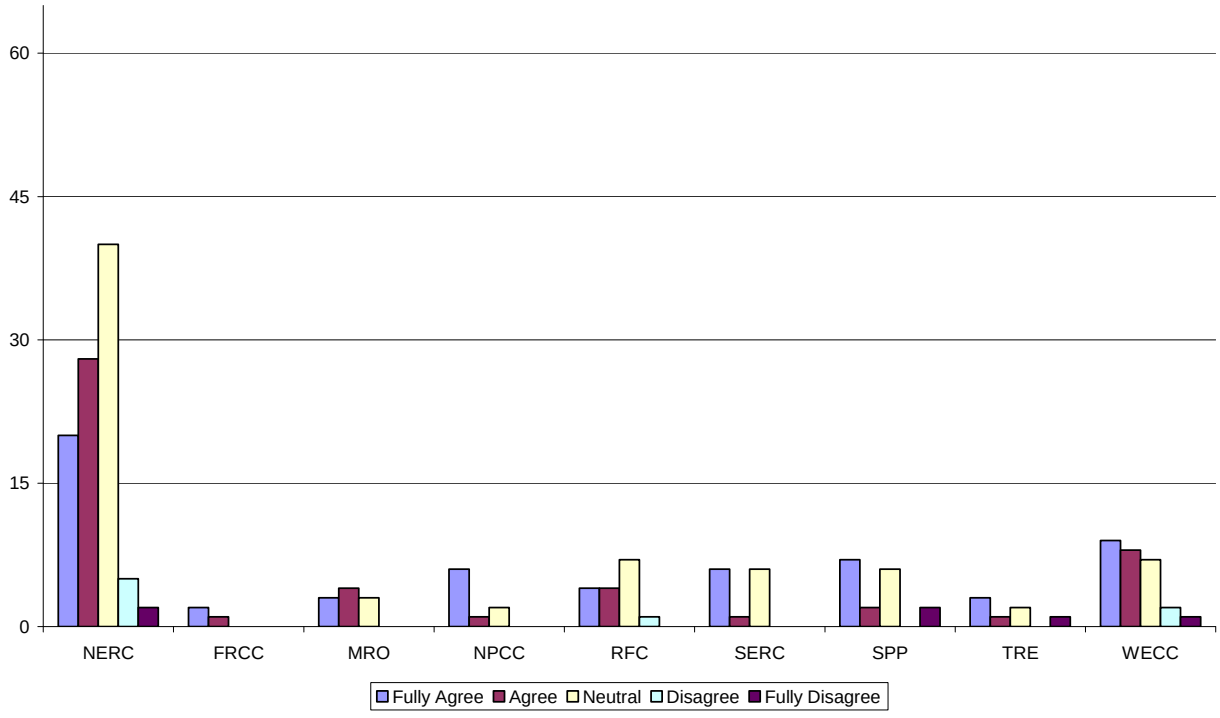
32. Is effective in performing accurate and independent assessments of the future reliability and adequacy of the bulk power system, and addressing in its reports substantive and timely issues that may impact future reliability.

	NA – Not applicable or have no opinion	1 – Fully agree	2	3 – Neutral	4	5 – Fully Disagree	Response Count
NERC	15.9% (18)	17.7% (20)	24.8% (28)	**35.4% (40)**	4.4% (5)	1.8% (2)	113
FRCC	**92.5% (37)**	5.0% (2)	2.5% (1)	0.0% (0)	0.0% (0)	0.0% (0)	40
MRO	**77.8% (35)**	6.7% (3)	8.9% (4)	6.7% (3)	0.0% (0)	0.0% (0)	45
NPCC	**78.6% (33)**	14.3% (6)	2.4% (1)	4.8% (2)	0.0% (0)	0.0% (0)	42
RFC	**67.3% (33)**	8.2% (4)	8.2% (4)	14.3% (7)	2.0% (1)	0.0% (0)	49
SERC	**71.7% (33)**	13.0% (6)	2.2% (1)	13.0% (6)	0.0% (0)	0.0% (0)	46
SPP	**65.3% (32)**	14.3% (7)	4.1% (2)	12.2% (6)	0.0% (0)	4.1% (2)	49
TRE	**82.9% (34)**	7.3% (3)	2.4% (1)	4.9% (2)	0.0% (0)	2.4% (1)	41
WECC	**57.1% (36)**	14.3% (9)	12.7% (8)	11.1% (7)	3.2% (2)	1.6% (1)	63
					Comments and recommendations:		30
						answered question	**121**
						skipped question	**21**

ERO Survey - Reliability Assessment
Question 32



ERO Survey - Reliability Assessment
Question 32

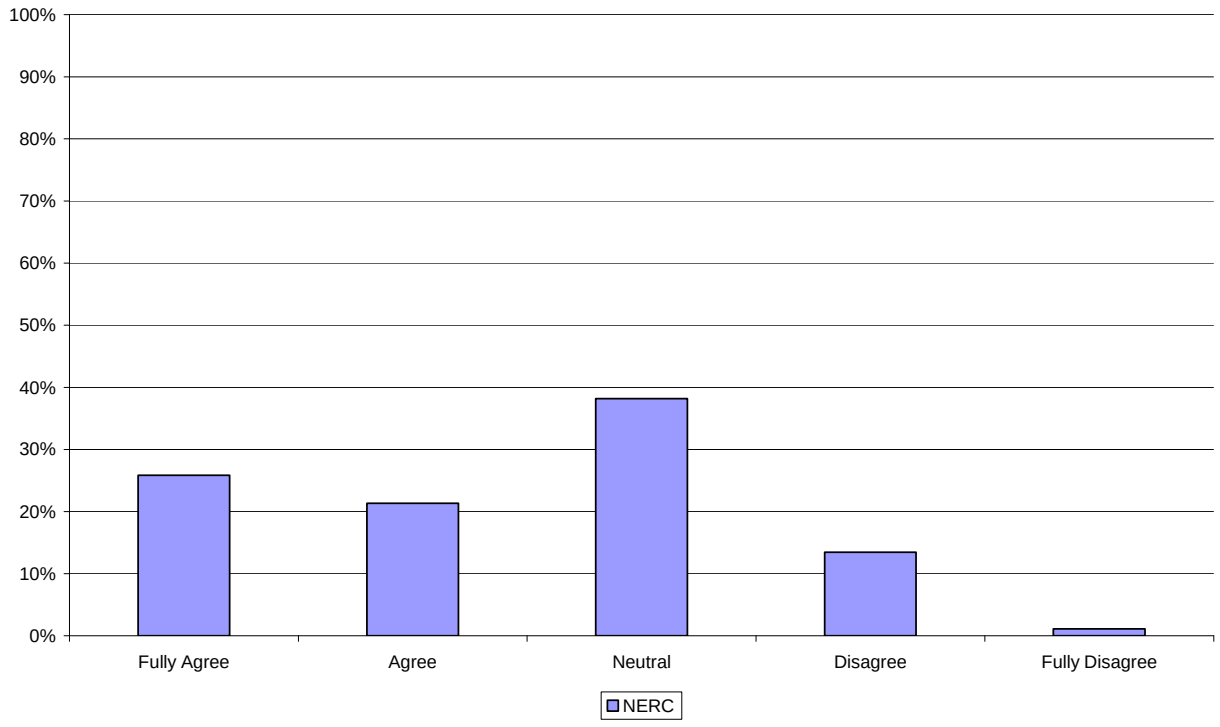


	Comments and recommendations:
1	1) This is really 2 questions (at least), not just 1. 2) NERC does not address reliability at all - it addresses security, not reliability or availability,
2	Comments : NERC has a well established process to perform Long Term Reliability Assessment on an annual basis. The Reliability Assessment Subcommittee (RAS) coordinates input from all Regional Entities to perform these assessments. The assessments are timely and address issues that may impact reliability. Exelon believes that NERC is improving its reliability assessment process. In particular, the recent report on the potential effects of climate change demonstrates NERC's commitment to assess substantive issues that may impact the industry. Exelon is an active participant on the RFC Transmission Performance Subcommittee. RFC has effectively dealt with conflicts among its stakeholders on the scope of reliability assessment efforts.
3	Electric industry representatives develop most of the technical aspects of these plans and studies. The RRO and NERC staff just compile the information.
4	I have less confidence in NERC because of the scope of the regions and the diversity found within each. Ifell that each region is a better judge of itself than NERC is because each region understands its own complexities.
5	In recent activity whereby NERC submitted resource assessment requests to the RROs wasn't handled well. RFC sent a request for data through its Reliability Committee which was subsequently forwarded to GO/GOPs within the PJM RTO by their System Operations Subcommittee (generation) for responses. SERC made the request through what appears to be select or random requests to some GO/GOP compliance managers (only the NUGs were notified to provide data among generators in the VEPCO service territory). The SERC questionnaire asked the entities for things like capacity margins, load growth, etc.
6	NERC NERC performs accurate and independent assessments of the future reliability and adequacy of the bulk power system and addresses substantive issues. However, NERC needs to share the information more effectively with its stakeholders through effective use of web-based tools. NPCC NPCC through its various task forces and work groups are effective in performing accurate and independent regional assessments on the future reliability and adequacy of the Northeastern bulk power system.
7	NERC and RFC have made good progress on improving the assessments.
8	NERC has a well established process to perform its Long Term Reliability Assessment, and seasonal assessments, on an annual basis. The Reliability Assessment Subcommittee (RAS) does a good job to coordinate input from all Regional Entities to perform these assessments. The assessments are timely and address issues that may affect bulk power system reliability. NERC needs to continue its focus on the assessment of bulk power system reliability and adequacy issues, and be careful to avoid taking policy advocacy positions.
9	NERC has a well established process to perform Long Term Reliability Assessment on an annual basis. The Reliability Assessment Subcommittee (RAS) coordinates input from all Regional Entities to perform these assessments. The assessments are timely and address issues that may impact reliability. NERC needs to continue its focus on the reliability issues and be careful not drift into "political" issues in these assessments.
10	NERC has a well established process to perform Long Term Reliability Assessment on an annual basis. The Reliability Assessment Subcommittee (RAS) coordinates input from all Regional Entities to perform these assessments. The assessments are timely and address issues that may impact reliability. NERC needs to continue its focus on the reliability issues and be careful not to drift into "political" issues in these assessments. SERC has a systematic process in place and performs in depth survey of the required data from the members and use it to prepare regional assessment for the NERC LTRA.
11	NERC has a well established process to perform Long Term Reliability Assessment on an annual basis. The Reliability Assessment Subcommittee (RAS) coordinates input from all Regional Entities to perform these assessments. The assessments are timely and address issues that may impact the bulk power system reliability. NERC should continue to focus on the reliability issues for the bulk power system.

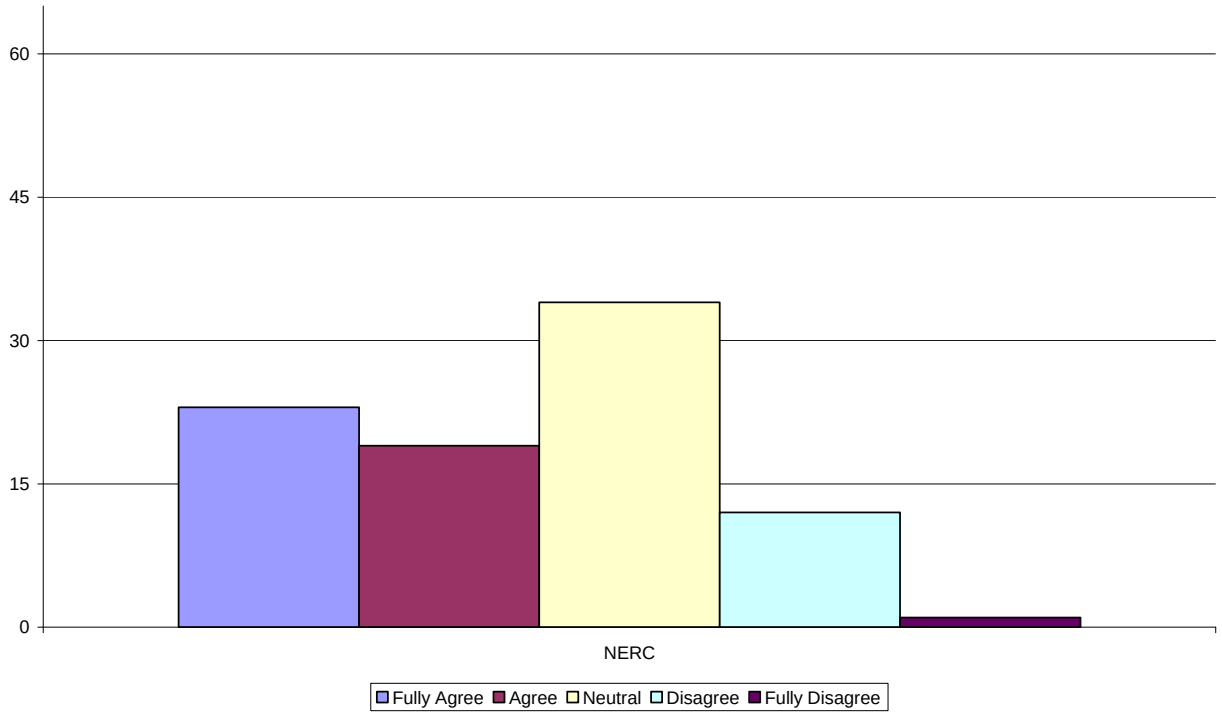
	Comments and recommendations:
12	NERC is improving in this area. Improvement needs to continue in the areas of metrics, definitions of terms, and methodology used in making assessments of the future reliability and adequacy of the bulk power system (long term and seasonal assessments).
13	NERC performs accurate and independent assessments of the future reliability and adequacy of the bulk power system and addresses substantive issues. However, NERC needs to share the information more effectively with its stakeholders.
14	No one has yet to fully assess the implications of climate change initiatives
15	None
16	NRECA continues to support the critical work NERC, the REs and the NERC standing committees conduct with the development of long-term, seasonal and other reliability driven assessments. Assessing the adequacy of the bulk power system in the United States and Canada is a critical role of the ERO. The results of these assessments are utilized by the industry, its regulators and federal and state policy makers in many important ways.
17	RFC and SERC have different approaches to Long-Term, Summer, and Winter Reliability Assessments.
18	RFC continues to struggle to determine what should be the scope, role, and purpose of the RFC reliability assessments in the context of the assessments performed by the RTO (PJM) and ISO (Midwest ISO), that between the two of them cover virtually all of the RFC footprint. These two entities continue to question efforts by RFC to conduct independent reliability assessments of the RFC footprint. Addressing this issue has consumed significant RFC member resources since the formation of RFC in 2006. Although progress has been made, a definitive resolution to this issue has yet to be found. TRE does not perform independent assessments of the TRE footprint.
19	Some of the NERC conclusions presented in these assessments are not based on well researched information or data provided by the regional entities but rather on unfounded assumptions.
20	SPP is a party to the IRC Standards Review Comments, please refer to that submittal for our response to this question.
21	Such reports may be available but I have not seen or read them.
22	TANC is not familiar with the NERC or WECC reliability assessments.
23	The assessments have been improving, but they must be more relevant, include critical reviews and address important reliability issues. However, they should avoid public policy advocacy, rather focus on reliability.
24	The audits are too administrative in nature. There is too much focus on documentation rather than focusing on whether entities are actually doing what they are supposed to do. There is little to no focus on real reliability results.
25	The FRCC does a great job reviewing the overall performance of the transmission system and reporting on issues that can impact future reliability.
26	The NERC/WECC assessments largely depend on the quality of the data/assessments provided by member systems, and NERC does follow up to gather data. The NERC IVGTF is one example of NERC demonstrating leadership on future issues.
27	These have been performed by industry professionals for years and have been effective for best practices.
28	We are not taking into account the future operating perameters of the grids.
29	WECC reliability audits were very effective. There is some concern that if this goes away, there will be some gaps in the NERC audit. Tacoma Power would like to see some kind of consolidation between NERC and WECC audits so that there is only one audit and it looks at existing compliance and readiness.
30	With potential RPS and Kansas having transmission and large potential wind resource, the transmission studies are large and backlog the expansion process. Feedback on specific TLR causes is difficult to access to perform long-term mitigation analysis for firm power contracts.

33. NERC is effective in reviewing, analyzing and reporting on regional self-assessments of electric supply and bulk power transmission reliability, including reliability issues of specific regional concern (applies to NERC only).								
		NA – Not applicable or have no opinion	1 – Fully agree	2	3 – Neutral	4	5 – Fully Disagree	Response Count
	NERC	23.9% (28)	19.7% (23)	16.2% (19)	**29.1% (34)**	10.3% (12)	0.9% (1)	117
							Comments and recommendations:	18
							answered question	**117**
							skipped question	**25**

ERO Survey - Reliability Assessment
Question 33



ERO Survey - Reliability Assessment
Question 33



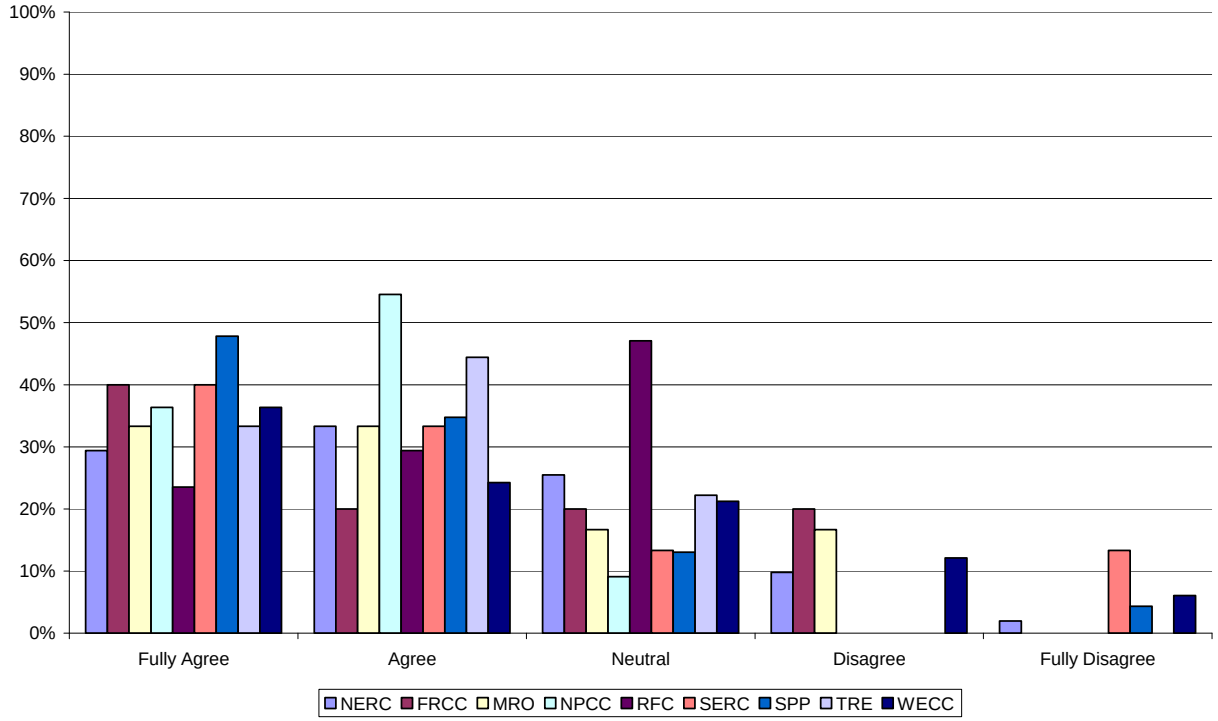
	Comments and recommendations:
1	Comments : Exelon has concerns about amount of data presently being collected and proposed to be collected by NERC and by regulatory agencies through NERC. In Exelon's experience, the most useful metrics are developed in connection with a rigorous problem definition effort in order to effectively monitor progress towards desired improvement on a timely basis. In some recent examples at NERC, such as the TADSII project, it appears that NERC may be defining metrics that are not directly tied to system reliability.
2	Doesn't appear to be adding much value, just taking what comes up from the RRO.
3	EEI understands that NERC continues to assume that vertically integrated utilities can provide data for all generation entities within their service territories, including merchant generators, which leaves holes in the data gathering process for reliability and adequacy assessments. NERC relies on the OE-411 data which captures long term resource commitments (or lack there of) to meet forecasted demand, but may not capture all "iron in the ground", that is, all resources if they are not committed. For example, in the deregulated states in the U.S. long-term commitments may not extend beyond 18 months. EEI also has concerns about the amount of data being collected, and proposed to be collected, by NERC and by regulatory agencies through NERC. The reasons for these concerns include NERC making data reporting mandatory without going through the stakeholders process such as TADS, the usefullness of the data to support bulk power system reliability, and possible lack of verification of the data, for example, data going to FERC in response to requests for situational awareness.
4	I don't see much evidence of effectiveness in this area for NERC. From our perspective, NERC does collect a plethora of data and information from the entities of the Regions; however, we don't see effective use being made of it. NERC appears to simply aggregate the data from the Regions, and it is not clear that anything substantive is done with the final analysis.
5	I have not seen any reporting by NERC on reliability issues of specific regional concern.

	Comments and recommendations:
6	NERC continues to assume that vertically integrated utilities can provide data for all generation entities within its foot print including merchant generators, which leaves hole in the data gathering process that is used to assess reliability. NERC relies on the OE-411 data which captures long term resource commitments (or lack there of) to meet forecasted demand, but may not capture all "iron in the ground", that is all resources if they are not committed. In the deregulated states, such as Illinois, the long-term commitment may not be available for more than 18 months. We have concerns about amount of data being collected and proposed to be collected by NERC and by regulatory agencies through NERC. The reasons for these concerns, besides need to provide volume of data, include NERC making data reporting mandatory without going through the stake holders process (e.g. TADS), questionable usage of the data to aid in BES reliability and possible lack of verification of the data (e.g. situation awareness data going to FERC).
7	NERC has a tendency to associate with the Eastern Interconnection and may not give as much consideration to the Western Interconnection which operates differently and as such, should have different operational requirements
8	NERC has done an effective job to incorporate regional self-assessments for reliability in order to assess the entire North American bulk power system. In doing so, NERC also relies on incoming data from entities that is used to determine a number of new assessments beyond capacity margins and regional congestion. NERC should continue these efforts within stakeholder process in order to collaborate on a number of fronts useful for these efforts: a) validity/source of the data, b) purpose of the data, c) timeliness of the data. NERC must provide additional transparency for the final use and purpose of all assessments in order for industry subject matter experts to provide the necessary inputs to such assessments. TADS data for instance will be proposedly used for additional reliability performance measures of the transmission network. In this case, peformance measures have been under development by EPRI with industry expertise over the last 2-3 years. NERC should include such efforts in the establishment of new reliability assessments and performance measurements.
9	NERC has made efforts to improve these assessments and should continue further improvements. NERC Staff has taken on a much greater role and so there is a tendency to move in a direction set by NERC management. However, as long as RAS continues to rely on RE staff and individual member reps to populate RAS (and other committees) reasonable balance will be achieved.
10	NERC is improving in this area. In compliance with FERC orders, NERC is currently implementing additional reviews of regional self assessments, such as independently reviewing load forecasts.
11	NERC is likely to overstate data with regard to issues pertaining to areas with ISO/RTO operations because it requires mulitiple entities to comply with the same data reporting provisions and risking the duplication of data.
12	NERC performs accurate and independent assessments of the future reliability and adequacy of the bulk power system and addresses substantive issues. However, NERC needs to share the information more effectively with its stakeholders through effective use of web-based tools.
13	NERC performs accurate and independent assessments of the future reliability and adequacy of the bulk power system and addresses substantive issues. However, NERC needs to share the information more effectively with its stakeholders.
14	SPP is a party to the IRC Standards Review Comments, please refer to that submittal for our response to this question.
15	TANC is not familiar with NERC's reviewing, analyzing and reporting on regional self-assessments and therefore must disagree with NERC's reporting effectiveness.
16	The reports should be improved with the goal of having a practical effect on the behavior of Registered Entities and on state and federal policy makers, all toward the goal of improving reliability.
17	There hasn't been much evidence that NERC independently assesses the results of the regional self-assessments. The depth of the regional assessments themselves seems inconsistent.
18	There is a lack of a clear and transparent process to incorporate NERC comments into the regional self-assessment. This results in a disconnect between the regional assessments and the NERC assessments.

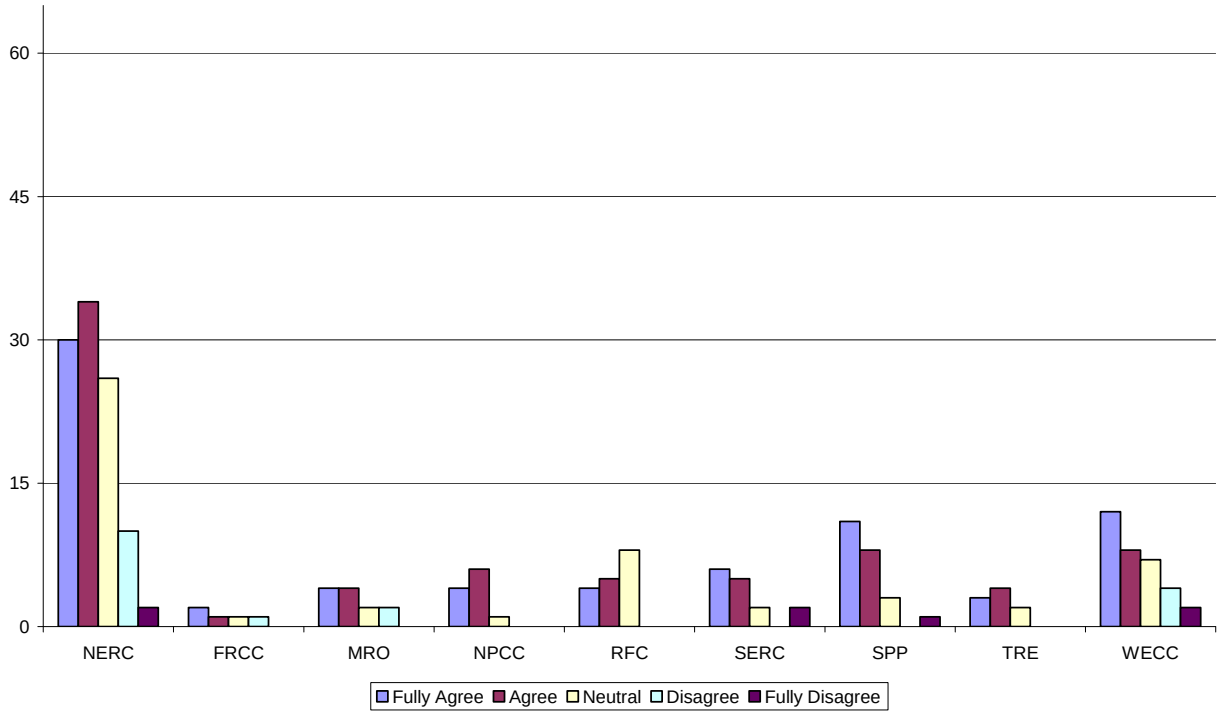
34. Communicates the essential messages of its reliability assessments to stakeholders, regulators and policy makers, and the public, so as to effectively advocate for actions that are necessary or appropriate to ensure future adequacy and reliability of the bulk power system.

	NA – Not applicable or have no opinion	1 – Fully agree	2	3 – Neutral	4	5 – Fully Disagree	Response Count
NERC	9.7% (11)	26.5% (30)	**30.1% (34)**	23.0% (26)	8.8% (10)	1.8% (2)	113
FRCC	**86.8% (33)**	5.3% (2)	2.6% (1)	2.6% (1)	2.6% (1)	0.0% (0)	38
MRO	**72.1% (31)**	9.3% (4)	9.3% (4)	4.7% (2)	4.7% (2)	0.0% (0)	43
NPCC	**71.8% (28)**	10.3% (4)	15.4% (6)	2.6% (1)	0.0% (0)	0.0% (0)	39
RFC	**63.8% (30)**	8.5% (4)	10.6% (5)	17.0% (8)	0.0% (0)	0.0% (0)	47
SERC	**65.9% (29)**	13.6% (6)	11.4% (5)	4.5% (2)	0.0% (0)	4.5% (2)	44
SPP	**53.1% (26)**	22.4% (11)	16.3% (8)	6.1% (3)	0.0% (0)	2.0% (1)	49
TRE	**76.3% (29)**	7.9% (3)	10.5% (4)	5.3% (2)	0.0% (0)	0.0% (0)	38
WECC	**45.0% (27)**	20.0% (12)	13.3% (8)	11.7% (7)	6.7% (4)	3.3% (2)	60
					Comments and recommendations:		21
						answered question	**119**
						skipped question	**23**

ERO Survey - Reliability Assessment
Question 34



ERO Survey - Reliability Assessment
Question 34



	Comments and recommendations:
1	Comments : NERC effectively communicates message of its reliability assessments and should continue to do so. However, again the focus should be on the reliability matters and not on the public policy debates.
2	Constrained by CEII considerations, RFC distributes a very abbreviated version of its detailed assessment reports to the entities listed in this question. On the other hand, Transmission Owners who are members of RFC have full access to the detailed RFC assessment reports. TRE does not perform independent assessments of the footprint.
3	In general, EEI believes that NERC effectively communicates the essential messages of its reliability assessments and should continue to do so. As previously stated, NERC needs to maintain its focus on assessing bulk power system reliability and adequacy, and avoiding policy advocacy positions.
4	Messages are sometimes vague with too much wordiness.
5	NERC NERC should improve its communications by developing an outreach program. The program should include offering additional webinars on various issues which would advocate NERC and industry views and concerns on important issues such as reliability, resource adequacy, energy scenarios, regulatory proceedings, transmission and generation projects, smart grid technologies etc. to interested parties and regulators. NPCC Comments and Recommendations: NPCC through its various task forces and work groups are effective in performing accurate and independent regional assessments on the future reliability and adequacy of the Northeastern bulk power system. However, NPCC should improve its communications by developing an outreach program. The program should include offering additional webinars on various issues which would advocate regional views and concerns on important issues such as reliability, resource adequacy, energy scenarios, regulatory proceedings, transmission and generation projects, smart grid technologies etc. to interested parties and regulators.
6	NERC and WECC have been good advocates over the years before FERC and Congress. AT times the process has been difficult. Sometimes the communication has been excessive making it difficult to watch all the changes to all standards. The Workshops are the most effective. Webinars work well too.
7	NERC communicates the findings of its assessments. However, the conclusions of these assessments tend to be exaggerated with respect to reliability impacts.
8	NERC effectively communicates message of its reliability assessments and should continue to do so.
9	NERC effectively communicates message of its reliability assessments and should continue to do so. However, again the focus should be on the reliability matters and not on the public policy debates.
10	NERC effectively communicates message of its reliability assessments and should continue to do so. However, again the focus should be on the reliability matters and not on the public policy debates.
11	NERC has strong technical writers.
12	NERC is essentially stating the obvious in these assessments, and I don't see anything earth-shattering come from their analyses; i.e., not much value is added here. In other words, the entities with emerging resource adequacy issues are already compelled to correct them, irrespective of the analysis and assessment performed by NERC.
13	NERC is improving in this area. NERC needs to ensure metrics are portraying correct and accurate information to everyone. While we recognize that in the short term NERC must attempt to use existing metrics, we are concerned that the use of such metrics can be misleading. For example, the number of TLR events has been used as a proxy for the sufficiency of transmission capacity. However, TLR events are primarily an indicator that some economic transactions may not be possible. The solution to such economic curtailments may involve the construction of either generation or transmission, or neither may be economic. Such misuse of the TLR metric may give the wrong signal to policy makers.
14	NERC needs to be cautious so that it does not introduce policy statements into assessments.
15	NERC should improve its communications by developing an outreach program. The program should including offering additional webinars on various issues which would advocate NERC and industry views and concerns on important issues such as reliability, adequacy, climate change, energy scenarios, regulatory proceedings, transmission and generation projects, smart grid technologies etc. to interested parties (mentioned in the question).
16	SPP holds regular multiple sessions with stakeholders in its STEP process. NERC simply publishes its report and moves onto the next study.

	Comments and recommendations:
17	SPP is a party to the IRC Standards Review Comments, please refer to that submittal for our response to this question.
18	TANC is not familiar with the NERC or WECC reliability assessments and therefore must disagree with the effectiveness of communication.
19	The FRCC has been very effective at communicating with state regulatory officials regarding the needs of the bulk power system.
20	The public is completely unaware of the costs associated with the NERC Reliability Standards. The wide array of current standards and those in development and the diversity of actual situations has created a situation where many of the requirements not only places a huge burden on the industry and the public that ultimately will fund the burden of the costs, but some of the mandatory requirements may not result in significant improvement to the reliability of the Bulk Electric System. Especially in light of the current market and economic climate, passing increased reliability costs on to rate payers will continue to be a challenge for the industry's utilities. Although regulatory agencies support the concept a reliable system, there is a tipping point where a cost/benefit analysis will be performed and state cost recovery may be jeopardized.
21	The reports should be improved with the goal of having a practical effect on the behavior of registered entities and on state and federal policy makers, all toward the goal of improving reliability. They should not advocate public policy objectives, rather focus on reliability.

35. Comments and recommendations:	
	Response Count
	14
answered question	**14**
skipped question	**128**

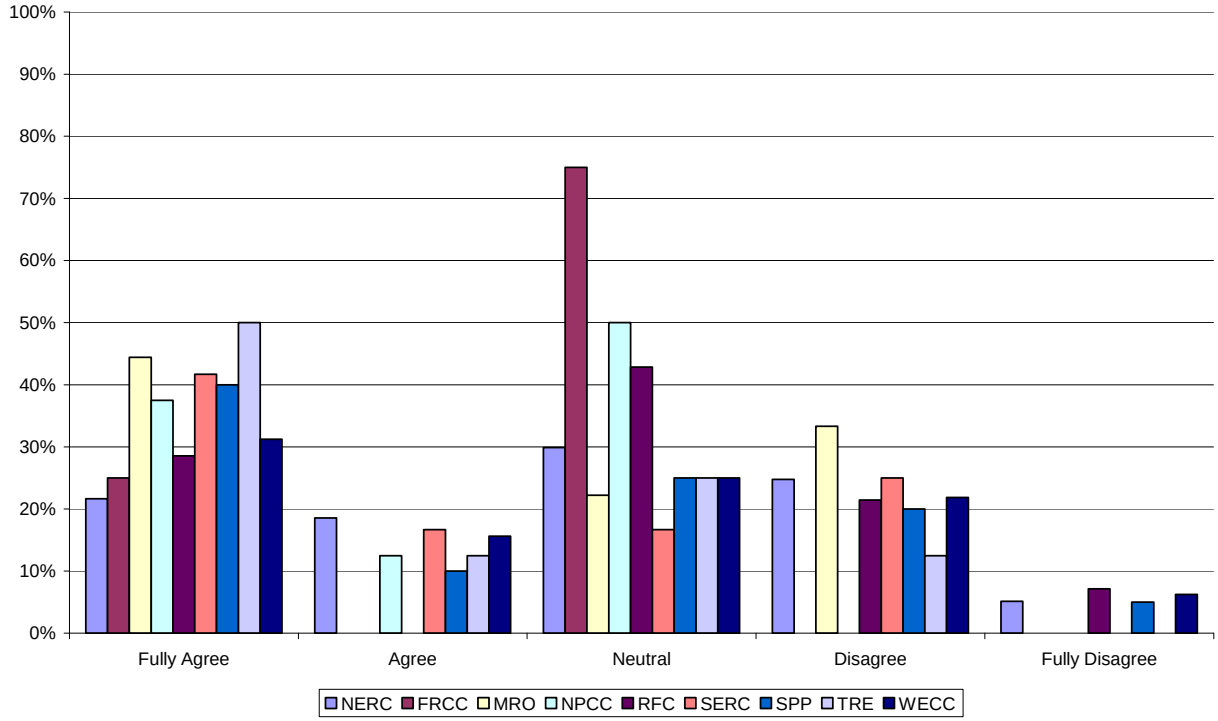
	Comments and recommendations:
1	1.Continue LTRA activities through RAS. 2.Improve the process to recognize the state mandated capacity procurement requirements which does not lend itself to provide a long-term trend and assessment. 3.Develop a stake holder process to approve mandatory data submittal if it is not related to compliance.
2	3. Develop a stake holder process to approve mandatory data submittal if it is not related to compliance.
3	In addition to the survey responses, EEI offers three general recommendations: 1. Continue LTRA and seasonal assessment activities through the Reliability Assessment Subcommittee. 2. Improve the assessment processes to recognize state-mandated capacity procurement requirements, which do not lend themselves to providing a long-term trend and assessment. 3. Develop a stake holder process to approve mandatory data submittal if it is not related to compliance.
4	NERC and the Regional Entities should explore the feasibility and practicality of expanding the scope of their reliability assessments beyond the present ten-year horizon to facilitate the development of robust backbone transmission systems to minimize/eliminate reliability problems.
5	NERC should conduct a survey similar to this one, but allow the responders to remain anonymous. It is very likely that NERC would receive different answers in such a survey.
6	none
7	None
8	None
9	None
10	Please see previous comments and recommendations.
11	Recommendation 1) NERC's reliability assessments have been improving, but they must be more relevant, include critical reviews and address important issues, with focus particularly on setting good reliability metrics to better measure long term performance and adequacy of the bulk power system.
12	See previous questions.
13	SPP is a party to the IRC Standards Review Comments, please refer to that submittal for our response to this question.
14	There are no comments and/or recommendations at this time.

Performance Analysis and Metrics

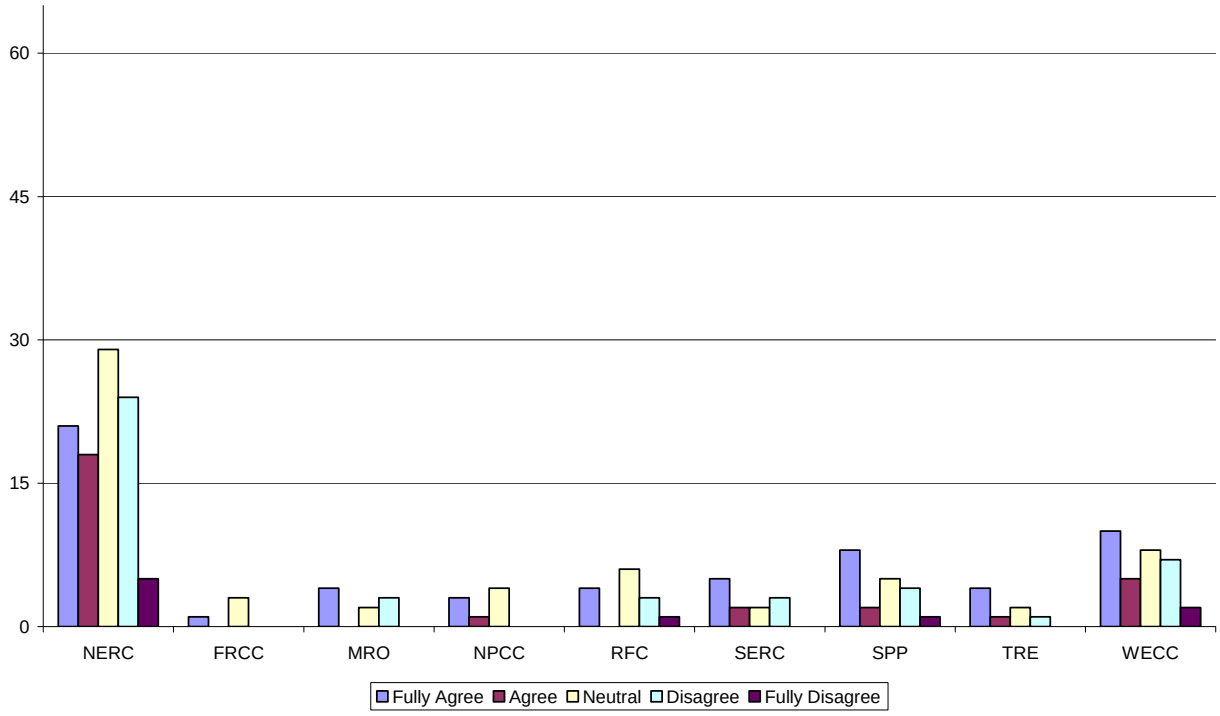
36. Has developed and is publishing and disseminating information on performance metrics and benchmarks that are useful to observing and understanding trends in the reliability of the bulk power system and in the reliability performance of users, owners and operators, and in highlighting areas for improvement.

	NA – Not applicable or have no opinion	1 – Fully agree	2	3 – Neutral	4	5 – Fully Disagree	Response Count
NERC	14.9% (17)	18.4% (21)	15.8% (18)	**25.4% (29)**	21.1% (24)	4.4% (5)	114
FRCC	**89.5% (34)**	2.6% (1)	0.0% (0)	7.9% (3)	0.0% (0)	0.0% (0)	38
MRO	**79.1% (34)**	9.3% (4)	0.0% (0)	4.7% (2)	7.0% (3)	0.0% (0)	43
NPCC	**80.5% (33)**	7.3% (3)	2.4% (1)	9.8% (4)	0.0% (0)	0.0% (0)	41
RFC	**70.8% (34)**	8.3% (4)	0.0% (0)	12.5% (6)	6.3% (3)	2.1% (1)	48
SERC	**73.3% (33)**	11.1% (5)	4.4% (2)	4.4% (2)	6.7% (3)	0.0% (0)	45
SPP	**60.0% (30)**	16.0% (8)	4.0% (2)	10.0% (5)	8.0% (4)	2.0% (1)	50
TRE	**79.5% (31)**	10.3% (4)	2.6% (1)	5.1% (2)	2.6% (1)	0.0% (0)	39
WECC	**49.2% (31)**	15.9% (10)	7.9% (5)	12.7% (8)	11.1% (7)	3.2% (2)	63
					Comments and recommendations:		31
						answered question	**119**
						skipped question	**23**

ERO Survey - Performance Analysis and Metrics
Question 36



ERO Survey - Performance Analysis and Metrics
Question 36



	Comments and recommendations:
1	1) Generation, yes. 2) Transmission, too early to tell.
2	1. Compliance and reliability are being wrongly used interchangeably here. I believe the information and performance is relative to compliance, which is actually documentation. Reliability should actually be statistical data as to outages and such throughout the electrical grid.
3	Although NERC/FRCC has groups working on this, there is much work to be done.
4	EEI agrees with statements made in the 2008 LTRA that various metrics may blur distinctions between market and reliability drivers. Improvements to performance metrics deserves more focused attention. EEI believes that NERC has not yet focused this program area as a priority, rightly focusing on the core standards development and compliance enforcement areas. However, characterizations made in the 2008 Long-Term Reliability Assessments, for example, the numbers of disturbance events and trends in frequency events, and TLRs, may not provide meaningful information to owners, users, and operators, or the public, for understanding how to best focus attention and resources aimed at supporting bulk power system reliability. In addition, EEI recommends that a defined process is needed for implementation of NERC Rules of Procedure Section 1600 addressing data collection, including the role of owners, users, and operators in determining need.
5	Exelon feels that the present NERC proposals for metrics will not produce data on a periodicity that it is timely enough to drive meaningful process improvement.
6	Frankly the performance metrics issued to date appear pretty thin. It is inherently difficult to measure performance associated with reliable operations when cascading outages are in fact rare events and near misses are difficult to identify anduse for trend analysis. APPA does not believe that TLR and other cutilment events are evidence of degraded operational performance unless firm generation to load TLRs are initiated (Firm PTP and network resources). Rather these measures are more evidence of inadequate transmission capacity.
7	Haven't seen much directly from NERC. WECC has provided useful compliance benchmarks from across regions. Improvement is being seen.
8	Haven't seen or heard about any of these.
9	I don't believe I have seen any bench marking items from TRE.
10	IMEA is not able to adequately comment due to limited resources available to monitor such plans. IMEA supports comments submitted by the Transmission Access Policy Study Group (TAPS) and the American Public Power Association (APPA). Such reporting to date seems more focused on stats related to adminstrative processing of noncompliances than on meaningful reliability performance metrics.
11	Need to enhance dissemination of information so that we can have meaningful metrics to use for benchmarking our performance and improving the reliability of the bulk power system. To date, NERC's metrics have not been useful in assessing NERC's impact on the reliability of the Bulk Power System.
12	NERC While we agree that dashboard and metrics data are useful, the self-assessment draws unsubstantiated conclusions (that things are getting worse). Any time a data collection process is put in place, you will capture more events for the same level of performance. This just means you are getting more efficient at identifying and capturing information. There is no breakdown by interconnection. Differences in interconnection performance don't point to superior or inferior performances. They point to differences in the way the various interconnections are operated. This interconnection parsing would help improve the consistency of the collection and reporting of information. NERC also needs to clearly explain the need for developing benchmarks and metrics. These should not be developed as a "good-to-have" metrics but as critical benchmarks which if not adhered to or bettered could have a detrimental effect on the reliability of the bulk power system. Before developing benchmarks, NERC should also see if existing regional or ISO/RTO metrics satisfy its requirements so that the regional processes are not duplicated.
13	NERC and RFC- Both entities need improvement in this area of metrics and benchmarks, as noted above.
14	NERC assessments do show trends and are telling but not concrete. SPP STEP is concrete but doesn't show trends from prior annual STEP studies.
15	NERC continues to develop its TADS project to better understand the performance of the Bulk Power System and trends in reliability.
16	NERC is doing a good job of publising information but it could be more timelier.
17	None

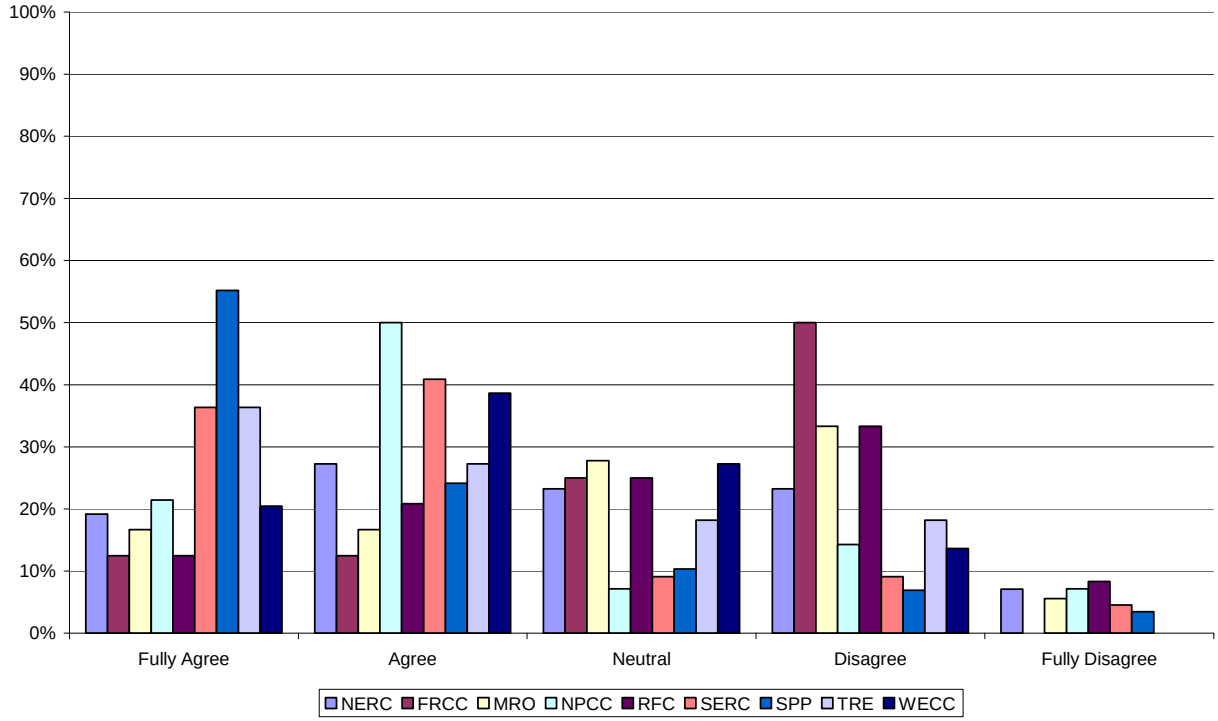
	Comments and recommendations:
18	Not enough information has been published to justify a ranking.
19	SPP is a party to the IRC Standards Review Comments, please refer to that submittal for our response to this question.
20	The EHV transmission plan to support RPS growth is drawing a multi-region coordination effort. This multi-region effort is needed to satisfy future needs and reliability across multiple BA regions and should take into consideration needs beyond just the bulk system (namely municipal utilities that are connected to distribution systems)
21	The LTRA contains comparison of the yearly data, but we have not found it to be very useful. NERC is just starting the TADS data collection, so benchmarking is not expected to be available for a few years from this effort.
22	The only programs have have gone through this process are the TADS Phase I and Phase II projects. Based on the results of the Phase II projects we believe that NERC needs to implement a formal comment and balloting stakeholder process. The TADS Phase II process resulted in NERC collecting planned outage data even when the majority of the industry commented that their was no benefit in analysis this data.
23	The publishing and dissemination of information on performance metrics don't convey long term reliability or an adequate level of reliability. They should be improved with the goal of having a practical effect on the behavior of Registered Entities and on state and federal policy maker, all toward the goal of improving reliability.
24	The Regional Entities have progressed faster and farther than NERC.
25	This is an area that NERC should remain committed to providing additional scope, process, progress and results to the industry. NERC has a number of initiatives in place in order to provide additional performance measurement monitoring tools that need additional industry input and expertise. (see Reliability Assessment Question #4). We should not rely soley on the efforts from a few NERC staff in order to put together what is undoubtedly a very complex set of bulk power system measurement tools that will be utilized for many years to come. Currently, the electric industry is not made aware of what is being developed and it should have input to it's development. Without such transparency, additional "unknown remote monitoring systems" creates insufficient collaboration in order to build on and improve reliability to the bulk power system. NERC must begin corresponding with the industry to discuss what is being worked on and how industry subject matter experts can support these efforts.
26	Too early to tell what will come from the TADS Program. Consistent and useful metrics are needed for transmission. The capacity margin/reserve margin is a useful generation metric.
27	We are not aware of much information that provides trending.
28	We are not aware that NERC or the REs have developed performance metrics. To the extent that NERC and the REs may publish seasonal assessments or after-the-fact reports, they are insightful and helpful, but hardly do they help in observing or understanding trends.
29	We don't see any significant activity in this area, but may simply be unaware. We haven't seen any useful performance metrics or trends developed.
30	What metrics?
31	While we agree that dashboard and metrics data are useful, the self-assessment draws unsubstantiated conclusions (that things are getting worse). Any time a data collection process is put in place, you will capture more events for the same level of performance. This just means you are getting more efficient at identifying and capturing information. There is no breakdown by interconnection. Differences in interconnection performance don't point to superior or inferior performances. They point to differences in the way the various interconnections are operated. This interconnection parsing would help improve the consistency of the collection and reporting of information. NERC also needs to clearly explain the need for developing benchmarks and metrics. These should not be developed as a "good-to-have" metrics but as critical benchmarks which if not adhered to or bettered could have a detrimental effect on the bulk power system. Before developing benchmarks, NERC should also see if existing regional or ISO/RTO metrics satisfy its requirements so that the regional processes are not duplicated.

Training, Education and Personnel Certification

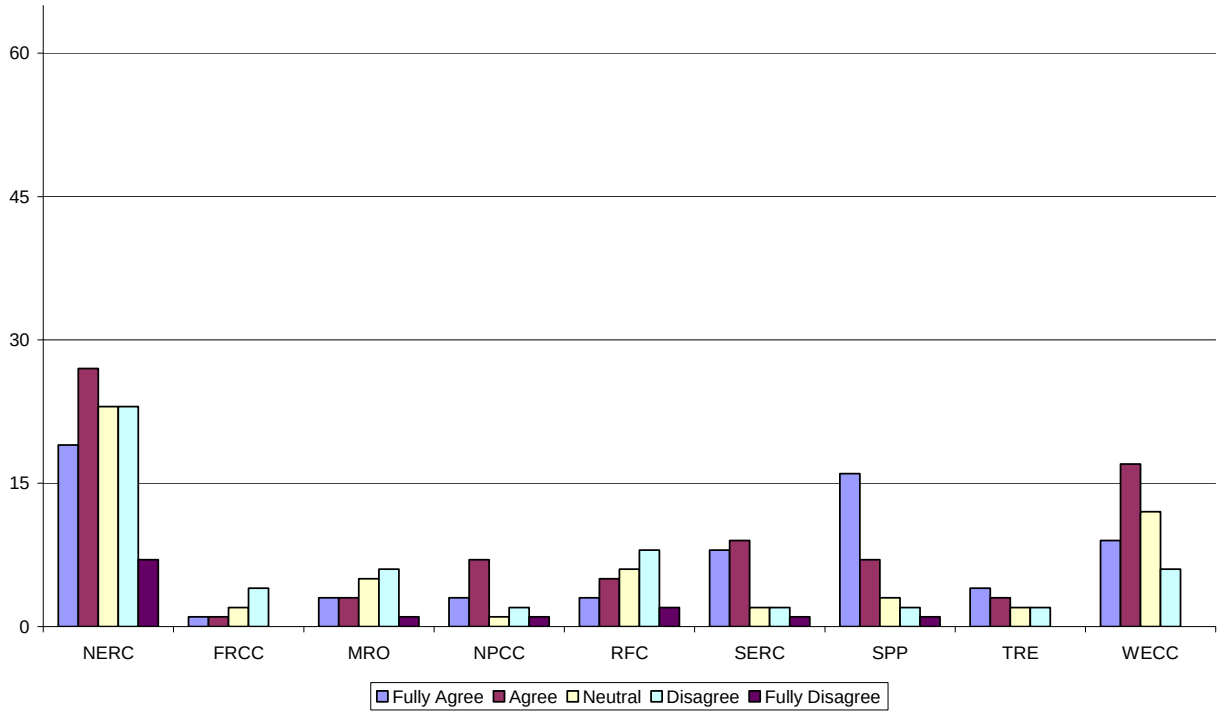
37. Has developed and implemented training and education programs on the requirements of reliability standards and the actions and documentation needed to demonstrate compliance and other topics to facilitate compliance and promote reliability of the bulk power system.

	NA – Not applicable or have no opinion	1 – Fully agree	2	3 – Neutral	4	5 – Fully Disagree	Response Count
NERC	11.6% (13)	17.0% (19)	**24.1% (27)**	20.5% (23)	20.5% (23)	6.3% (7)	112
FRCC	**78.9% (30)**	2.6% (1)	2.6% (1)	5.3% (2)	10.5% (4)	0.0% (0)	38
MRO	**60.0% (27)**	6.7% (3)	6.7% (3)	11.1% (5)	13.3% (6)	2.2% (1)	45
NPCC	**65.0% (26)**	7.5% (3)	17.5% (7)	2.5% (1)	5.0% (2)	2.5% (1)	40
RFC	**52.0% (26)**	6.0% (3)	10.0% (5)	12.0% (6)	16.0% (8)	4.0% (2)	50
SERC	**53.2% (25)**	17.0% (8)	19.1% (9)	4.3% (2)	4.3% (2)	2.1% (1)	47
SPP	**45.3% (24)**	30.2% (16)	13.2% (7)	5.7% (3)	3.8% (2)	1.9% (1)	53
TRE	**71.1% (27)**	10.5% (4)	7.9% (3)	5.3% (2)	5.3% (2)	0.0% (0)	38
WECC	**33.3% (22)**	13.6% (9)	25.8% (17)	18.2% (12)	9.1% (6)	0.0% (0)	66
					Comments and recommendations:		43
						answered question	**122**
						skipped question	**20**

ERO Survey - Training, Education and Personnel Certification
Question 37



ERO Survey - Training, Education and Personnel Certification
Question 37



	Comments and recommendations:
1	1. The learning curve is still steep for everyone. Acceptable compliance seems subjective and ever changing as knowledge is gained.
2	Activity is required in this area to clarify what documentation is required to demonstrate compliance. Both NERC and RFC should promote reliability by coaching and not just policing.
3	Although training has occurred, the information provided is not binding on the Regions or NERC for compliance purposes.
4	AS A SMALL UTILITY IT HAS BEEN OVERWELMING PUTTING ALL DATA TOGETHER AND LEARNING THE COORECT/ACCETABLE DOCUMENTS TO BE IN COMPLAINCE. THERE SHOULD BEEN MORE OF START UP PERIOD FOR TRAINING AND FULL ENFORCEMENT WITH FINES Just needed more semairs. we all are learnig as we go includinG NERC AND RFC STAFF.
5	As noted earlier, more training on the evidence required to demonstrate compliance to would be helpful for individual Registered Entities. This would also increase consistency across regions by driving towards uniform understanding of the evidence required. Training could be online and available to all Registered Entities. Training could be tailored to be specific to individual or multiple NERC functions. Registered Entities could select train for the functions for which they are registered.
6	At the NERC level there is virtually no training and education program that focuses on educating the industry on reliability standards and compliance. At the regional level however, training and education involvement ranges from virtually “no” training and education by the RFC (Reliability First) region to annual NERC CE approved training and education programs delivered multiple times within a calendar year by SERC. We believe that the benefits of offering reliability standards training are essential and we would encourage the RFC to adopt a similar training process.
7	Continued growth in training will occur and is necessary to achieve common understanding of a relatively new expanded registration. As knowledge is increased additional training will be necessary to support entities in growth and additional registrations.
8	EEI understands that NERC has conducted several workshops that have been aimed at raising general awareness. It is unclear whether these sessions focused on how companies would need to demonstrate compliance or promote bulk power system reliability.
9	For the CIP Standards WECC has done an outstanding job through their CIPS outreach program in promoting an understanding of the requirements and the actions/evidence needed to demonstrate compliance in an audit. The outreach program has exceeded the industry's expectation and has helped promote good utility practice in providing security to those assets and cyber assets identified in CIP-002-1.
10	Generalities are given on how to demonstrate compliance, but exact specifics on how to demonstrate compliance to standards are omitted.
11	IMEA would like to see more emphasis on Workshops to facilitate compliance (as recently implemented by RFC), as opposed to Seminars summarizing compliance monitoring and enforcement procedures.
12	It would have been more helpful to have more guidance from NERC for interpretations.
13	More attention should be paid to the entities of DP, LSE and PSE.
14	Neither NERC nor the MRO is doing enough to remove ambiguities that exist with regards to the specific requirements to meet compliance. Entities continue to struggle with the content of documentation and actions required to meet compliance.
15	NERC NERC holds compliance workshops and webinars with standard drafting teams (SDTs) and NERC staff which provide an insight into the requirements of reliability standards. NERC’s RSAWs also help in identifying actions and documentation required to demonstrate compliance with standards. However, we don’t recall any specific NERC sponsored training on requirements of reliability standards that facilitate compliance and promote reliability. NPCC NPCC holds compliance workshops which provide an insight into the various requirements of standards. NERC’s RSAWs which are used by all the regional entities including NPCC also help in identifying actions and documentation required to demonstrate compliance with standards.

	Comments and recommendations:
16	NERC and regional entities are reluctant to indicate what documentation and other evidence effectively demonstrates compliance. This reluctance is rationalized by statements that it would be a conflict of interest for NERC and/or the regional entities to provide guidance on matters for which they audit. If the objective of the reliability standards is to ensure the reliability of the bulk power system, then it seems that NERC and the regional entities should be interested in assisting registered entities in their efforts to perform to and comply with the standards. To its credit, WECC conducts an outreach program that includes Compliance User Group meetings. While these meetings offer benefits to registered entities, WECC often communicates new policies and procedures regarding its compliance efforts that are not supported by its FERC approved Compliance Monitoring and Enforcement Program (CMEP). When the WECC CMEP is silent or contradicts what the WECC compliance department communicates through its outreach efforts, registered entities are no better informed about how best to demonstrate compliance.
17	NERC and SPP have been available to assist and discuss issues during phone conference calls. Also, the webinars and compliance conferences have been helpful.
18	NERC and the Regions have not offered Registered Entities and Compliance Training to assist them in understanding documentation requirements. WECC continues to reach out to Registered Entities through its Compliance Users Group meetings, though a formal Training Program is needed.
19	NERC has developed Operator Training program but it is only for a few functional entities. The other entities whose operational duties impact reliability of the BES should have a training program also. The Standards are not standalone documents and the RSAWs do not serve as educational material/ program. NERC should have extensive training documents that make it obvious what actions and documents are needed to demonstrate compliance. Auditor training content is good, but access window is too limited (i.e. potential member of audit team should have access to the material further in advance). SERC conducts several Compliance Seminars and open forum Webinars to present,discuss, and educate on compliance matters including topics to facilitate compliance and promote reliability. Auditor training content is good, but access window is too limited (i.e. potential member of audit team should have access to the material further in advance)
20	NERC holds compliance workshops and webinars with standard drafting teams (SDTs) and NERC staff which provide an insight into the requirements of reliability standards. NERC's RSAWs also help in identifying actions and documentation required to demonstrate compliance with standards. However, we don't recall any specific NERC sponsored training on requirements of reliability standards that can be shown to facilitate compliance and promote reliability. The Transmission Owners and Operators Forum is one means a segment of the industry can share ideas on how their experiences have resulted in certain outcomes. But this knowledge is based on empirical audit findings and is an indirect means for industry to obtain knowledge on how to adjust practices to meet reliability requirements. NERC must develop a way for industry to have a two way communication with the enforcers of the requirements without fear of retribution. Meeting reliability objectives through proactively informing and education registered entities should be a part of NERC's mission and NERC should not rely solely on industry to improve reliability through the issuance of penalties.
21	NERC is lacking in this area. In checking the schedule for the first six months of 2009 there are no workshops scheduled.
22	NERC should d a great deal more to train and educate on the requirements of the reliability standards and the documentation needed to demonstrate compliance. With standards being developed and redeveloped, frequent, quality communication will be necessary for Registered Entities to understand new and revised requirements. Conference capacity is too low, and insight provided is not enough to facilitate unambiguous compliance.
23	NERC, MRO and RFC have developed and implemented training on the requirements of reliability standards and documentation needed to demonstrate compliance. The seminars and webinars provided by these organizations are examples that ATC has utilized.
24	NERC/RFC Q1: Although NERC and RFC have attempted to provide programs on reliability standards, the content of the workshops has not provided the necessary details on actions and documentation needed to demonstrate compliance.

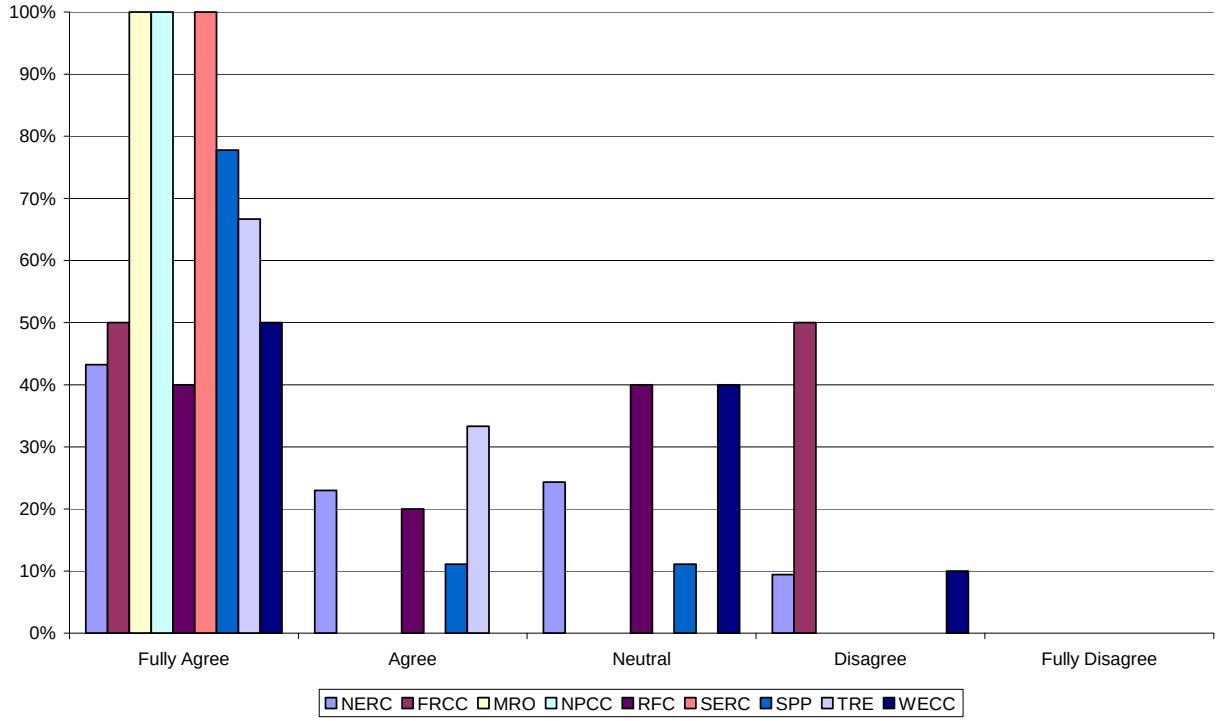
	Comments and recommendations:
25	No clear direction exists yet as to what is needed to demonstrate compliance and NERC and the Regions appear reluctant to provide substantive guidance. Exelon feels that the information that has been posted on www.regionalentities.org is a positive development. However, this information is currently at a high level and does not provide specific guidance for particular requirements.
26	Outreach program for SERC has been reasonably effective. More information is needed about the specific violations that are being seen, so that registered entitied can make needed improvements where necessary.
27	SPP is a party to the IRC Standards Review Comments, please refer to that submittal for our response to this question.
28	The information NERC develops and disseminates as a result of Event Analysis is useful as lessons learned about what happened, what worked and what did not. However the recommendations coming out of the analysis are not useful in most part as they are based on incorrect assumptions that cause(s) of the event analyzed represent a general practice in the industry. Further, the recommendations should be supported by all participant of the event analysis group and should not promote a wish list of the few. The timeliness of disseminating the information needs significant improvement. The backlog of completion of the event analyses (i.e. MRO Separation Event from September 2007, Florida Blackout from February 2008) has delayed implementation of lessons learned in the industry in order to enhance reliability. In this regard, there needs to be a clarity in defining the scope of the analysis so that it does not become an open ended process and turn into a witch- hunt. Workshops offered by NERC and the Regions thus far, have generally not provided the necessary details on actions and documentation needed to demonstrate compliance.
29	The loss of technical talent and lack of rebuilding such talent has resulted in the NERC not producing the training presentations or training documents of the quality that it produced years ago. NERC holds occasional webinars more as informational sessions, which may have some training within. The SPP is involved in providing operations/operator training annually related to operations seminars, regional classroom, and net-conference training. This training addresses NERC Standard requirements when applicable and promotes reliability of the bulk power system, thus meeting 80% or more of the conditions in the above statement.
30	The system operator training should spend more time on the new standards being implemented as well as more time on where registered entities are “missing the boat” on the most violated standards.
31	The WECC workshop offering and user group meetings have been very beneficial.
32	There have been some programs, but the information has been too general to be really useful. Requests for more detailed information have been met with resistance, with the regulator indicating that helping the industry to understand and meet the standards is no longer a primary goal.
33	There is a massive void i this area. There should be NERC RS specific training and audit specific training. The "Workshops" are too vague and cover trands. Industry needs specifics.
34	There is a need for improved clarity on what is required by the Applicable Entities to adequately demonstrate their compliance.
35	Through its compliance users groups and Open Mic Conference calls, WECC has done a great job with outreach. However, consistency and reasonableness are not always attained. Neither NERC nor WECC have yet provided sufficient information on what constitutes documentation needed to demonstrate compliance for individual standards and requirements. As entities have shared documentation that has been sufficient for an audit, we have found that other entities have used identical or similar documentation and been found non-compliant.

	Comments and recommendations:
36	To my knowledge neither NERC nor the FRCC has set up training and education programs targeted at specific requirements and what actions & documentation are required to demonstrate compliance. Now FRCC members independent of the FRCC audit staff have set up training and education programs, however these are not as valuable as they would be if the audit staff participated in a meaningful manner. The clear opinion of regional compliance staff however is that they are not allowed by NERC to provide meaningful comments on any compliance related topic outside of the framework of an audit. Since the standards themselves were not written from the perspective of word by word compliance with supporting evidence, this creates quite a challenge for the entities and for the audit staff. Better open communication on what audit staff expectations are would not only speed up the audits and reduce their work load, but would give clear guidance to the members on how to comply with a requirements, or at least on one method to comply with a requirement.
37	Training has fallen on the entities and industry themselves. While NERC and RFC did provide the "what" and "how" training for the CIP standards. there has been little to no other training in regard to the standards.
38	Webinars, Regional Compliance Workshops, RSAW's
39	WECC CUG and CIPUG have provided useful education on some specific requirements, and WECC's effort to provide auditor training is appreciated. NERC and WECC should provide this type of education and not leave it to third-party consultants.
40	WECC has utilized a Compliance Users Group Workshops as a forum for education of the registered entities on the NERC Standards. However, WECC will not include information or materials that describe model compliance or model evidence packages. They do not address the key compliance question from the entities about what constitutes satisfactory evidence. This leaves the entities scrambling to interpret the Standards in pursuit of suitable evidence strategies.
41	WECC was originally performing quite dismally in this area, but substantial improvement has been observed over the past four to six months. Education opportunities are now being offered more equally to all parts of their region, and more material is available.
42	WECC's outreach (the Compliance User Group meetings and open mic meetings) are excellent. The small number of NERC sessions we have attended on registrations and version 0 standards have been helpful. Kudos to WECC for their outreach. CIP training has been confusing to the point of being not helpful.
43	Without any guidance from NERC or the regions the entities have the burden to interpret the requirement applying FERC's Order 693 and NERC's RSAWS that are in some cases created additional requirements that expand the compliance obligations. To satisfy the requirements compliance obligations, Dominion developed reliability standards guideline templates to help Dominion’s business units develop an overall compliance structure to the NERC Standards. The templates are intended to provide clarity to the requirements and measures of the reliability standards.

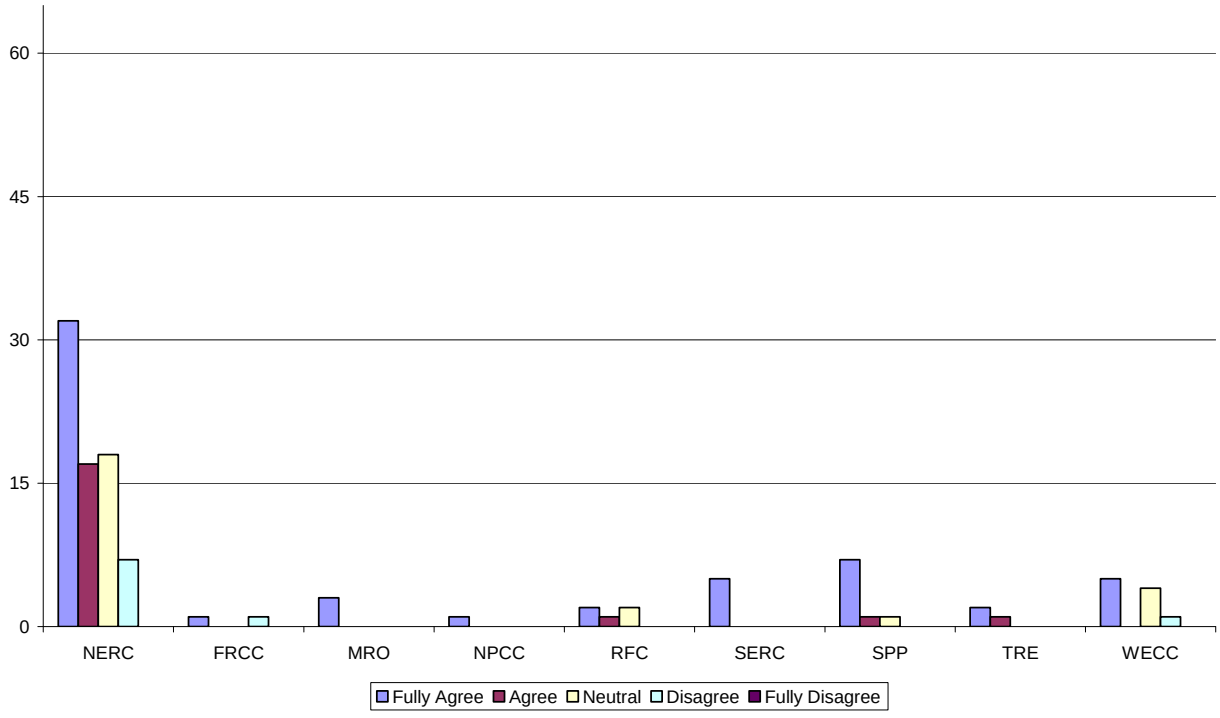
38. Has established and implemented an effective program for issuing certification credentials to, and maintenance of the certification credentials by, operating personnel of owners, operators and users of the bulk power system (applies to NERC only, unless Region has a personnel certification program).

	NA – Not applicable or have no opinion	1 – Fully agree	2	3 – Neutral	4	5 – Fully Disagree	Response Count
NERC	**33.9% (38)**	28.6% (32)	15.2% (17)	16.1% (18)	6.3% (7)	0.0% (0)	112
FRCC	**94.1% (32)**	2.9% (1)	0.0% (0)	0.0% (0)	2.9% (1)	0.0% (0)	34
MRO	**91.9% (34)**	8.1% (3)	0.0% (0)	0.0% (0)	0.0% (0)	0.0% (0)	37
NPCC	**97.1% (34)**	2.9% (1)	0.0% (0)	0.0% (0)	0.0% (0)	0.0% (0)	35
RFC	**88.6% (39)**	4.5% (2)	2.3% (1)	4.5% (2)	0.0% (0)	0.0% (0)	44
SERC	**86.8% (33)**	13.2% (5)	0.0% (0)	0.0% (0)	0.0% (0)	0.0% (0)	38
SPP	**78.0% (32)**	17.1% (7)	2.4% (1)	2.4% (1)	0.0% (0)	0.0% (0)	41
TRE	**91.4% (32)**	5.7% (2)	2.9% (1)	0.0% (0)	0.0% (0)	0.0% (0)	35
WECC	**79.2% (38)**	10.4% (5)	0.0% (0)	8.3% (4)	2.1% (1)	0.0% (0)	48
					Comments and recommendations:		22
						answered question	**117**
						skipped question	**25**

ERO Survey - Training, Education and Personnel Certification
Question 38



ERO Survey - Training, Education and Personnel Certification
Question 38



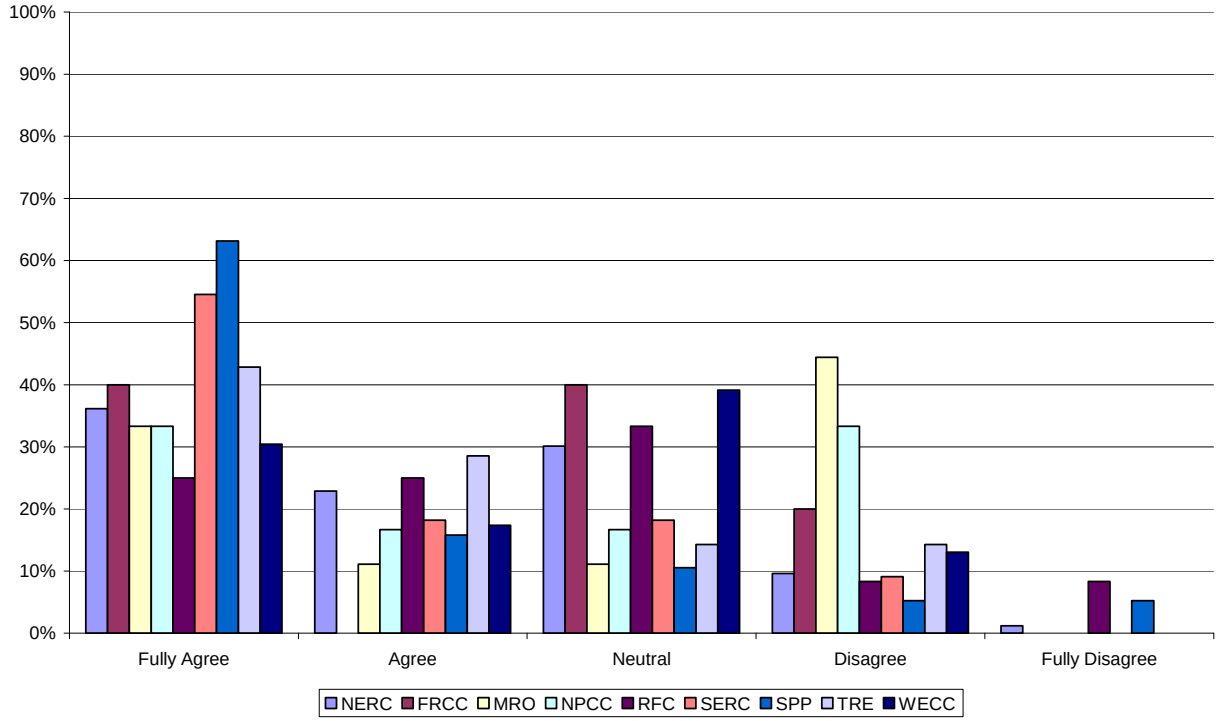
	Comments and recommendations:
1	Again, the NERC certification process is for TOPs. However not all TOPs are the same. if a TO does not have a UFLS program, a UVLS program, an SPS program or a system restoration program what is the value to the reliability in making small transmission owners have certified NERC operators? The expense is there but the reliability increase is not.
2	EEI understands that companies have strongly supported the NERC certification and continuing education programs as effective tools to support bulk power system reliability.
3	Entity support personnel should not be required to have continouseducation hours, They should just take the certification exam every five years.
4	I have been dealing with the certification credentials for operators for the last six years. It still can be confusing.
5	Massive NERC gaps in this area - or massive gaps in communicating the information if its out there. TRE needs Complianc training. ERCOT does a good job.
6	NERC has a commendable operator training and certification program and a continuing education (CE) program to maintain certification.
7	NERC has a commendable operator training and certification program and a continuing education (CE) program to maintain certification. We are concerned with the steady decline in the pass rate of the certification exam (about 5 percentage points per year since 2004). We don't believe this can be explained away as due to the quality of the test-takers. There is no control group to make that assertion. We are concerned that perhaps there is something that is making the exams more difficult. When only 65% of people hired to do a job can pass the test (most likely having gone through local training for preparation), there may be a problem with the test process.
8	NERC has a program for RC, BA, and TOP certification. We believe that a similar program should be developed for the GO and GOP certification and perhaps for DP involved in transmission and/or UFLS issues.
9	NERC has established and implemented an effective program for issuing certification credentials to operating personnel.
10	Operator Certification is a great example.
11	Personnel conducting training, which need to maintain certification, should get credit for conducting the training.
12	Plant operators, field personnel, and region dispatchers need to be certified. Continuing education programs need to ensure effective learning occurs.
13	Provides NERC certification requirements for security/systems operators. In addition, NERC approves training curriculum that satisfies the training requirements for the operators under the NERC standards.
14	SPP is a party to the IRC Standards Review Comments, please refer to that submittal for our response to this question.
15	Still hasn't implemented to our knowledge entity specific credentialing process
16	The certification exam has changed from one of understanding the rules of the power system to requiring personnel to have significant experience in monitor and controlling of the power system.
17	The certification program has a good start. It is just this year rolling over into the CEH requirement. The computer database has had numerous problems but seems to be functioning better now. The CEH requirement keeps changing which makes it difficult to keep up. Hopefully it will settle down shortly but with PER-005 on the horizon, that seems unlikely.
18	The Continuing Education Program and the System Operator Certification program should be raised to a level commensurate with certification programs in use in the engineering, accounting, and administrative assistant fields.
19	This is applicable only to NERC. NERC has a very good and well documented program for certification and certification maintenance.
20	Very good program for the 24 x7 operators but falls short on a program for support staff managers.

	Comments and recommendations:
21	What is in place is excellent. The program could become more efficient if it would encompass all the NERC training standards rather than requiring separate programs for continuing education that must be maintained at the entity level. Many other certification programs operate this way (Project Management Institute, PMP certification, Professional Engineer certification, CPA) by certifying training courses and collecting and maintaining records of continuing education in order to verify continued certification. This would simplify record keeping and auditing at the entity level considerably.
22	While we feel that NERC has a reasonably effective program for issuing certification credentials and for the maintenance of those credentials, we feel that the tracking system could be improved. Expanded permissions should be given to entity program administrators so that they can see ALL courses and not just the courses that their entity provided since the administrator is responsible for assisting the operator in tracking their CE hours. Also, expanding the billing privileges to include American Express would give entities who use Corporate American Express another option for bill payment.

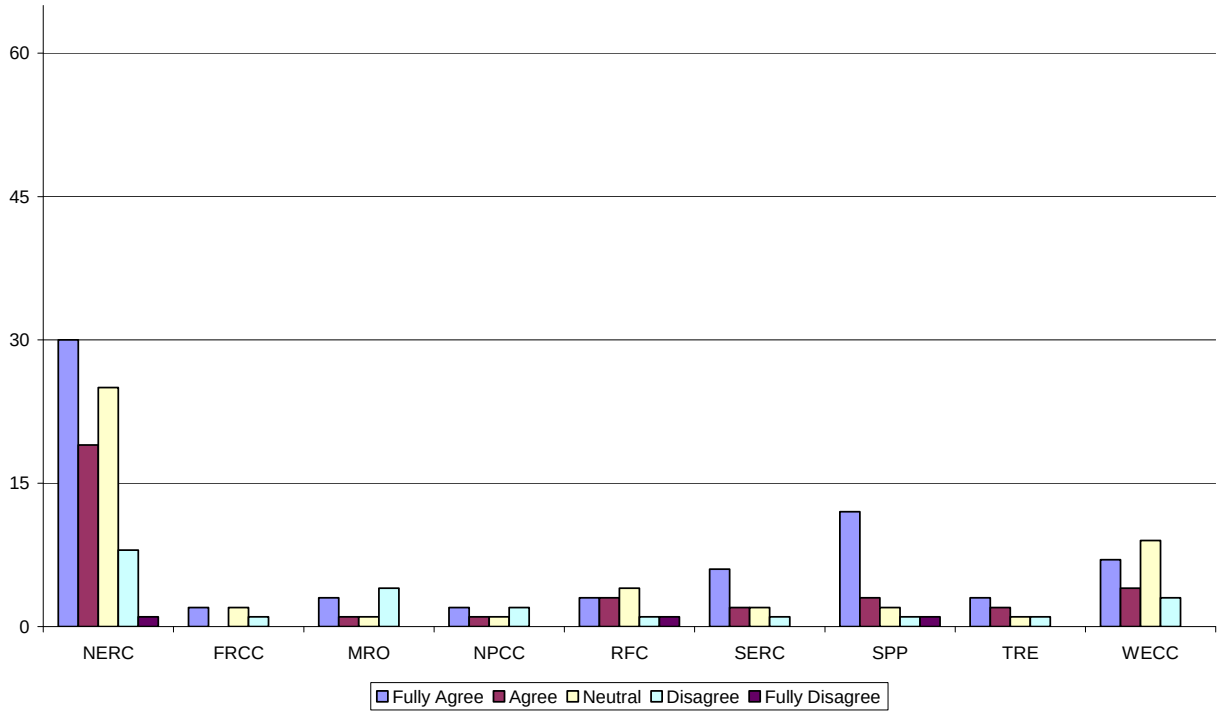
39. Has established and implemented a program to promote quality and improvements in continuing education and training programs offered by owners, operators and users of the bulk power system to their operating personnel, including developing and maintaining a process to approve continuing education and training providers by establishing requirements for, and conducting periodic audits of, such providers and activities.

	NA – Not applicable or have no opinion	1 – Fully agree	2	3 – Neutral	4	5 – Fully Disagree	Response Count
NERC	25.9% (29)	**26.8% (30)**	17.0% (19)	22.3% (25)	7.1% (8)	0.9% (1)	112
FRCC	**86.1% (31)**	5.6% (2)	0.0% (0)	5.6% (2)	2.8% (1)	0.0% (0)	36
MRO	**76.9% (30)**	7.7% (3)	2.6% (1)	2.6% (1)	10.3% (4)	0.0% (0)	39
NPCC	**83.8% (31)**	5.4% (2)	2.7% (1)	2.7% (1)	5.4% (2)	0.0% (0)	37
RFC	**73.3% (33)**	6.7% (3)	6.7% (3)	8.9% (4)	2.2% (1)	2.2% (1)	45
SERC	**73.2% (30)**	14.6% (6)	4.9% (2)	4.9% (2)	2.4% (1)	0.0% (0)	41
SPP	**59.6% (28)**	25.5% (12)	6.4% (3)	4.3% (2)	2.1% (1)	2.1% (1)	47
TRE	**80.6% (29)**	8.3% (3)	5.6% (2)	2.8% (1)	2.8% (1)	0.0% (0)	36
WECC	**58.2% (32)**	12.7% (7)	7.3% (4)	16.4% (9)	5.5% (3)	0.0% (0)	55
						Comments and recommendations:	25
						answered question	**118**
						skipped question	**24**

ERO Survey - Training, Education and Personnel Certification
Question 39



ERO Survey - Training, Education and Personnel Certification
Question 39



	Comments and recommendations:
1	Agree
2	EEI is not aware of any mechanism implemented by NERC for tracking recommendations nor does it see a need for one. The recommendations of the Event Analysis are not “requirements“ and therefore do not require tracking.
3	EEI understands that companies have strongly supported the NERC certification and continuing education programs as effective tools to support bulk power system reliability.
4	Exelon supports and utilizes the NERC Continuing Education Program operations training. Exelon is a NERC Approved Provider of Continuing Education Hours.
5	FRCC provides cost effective, quality programs that are focused on regional operators educational needs.
6	I know NERC initiates the CEH program, but I have not seen any oversight into this program for at least five years. TRE to my knowledge has never taken a vested interest in this program.
7	It would be helpful for NERC to search and find these outside sources of training that they will accept and provide information on the contacts, etc. Example: Department of Homeland Security Cyber Security Training
8	Looking for regional help on internal auditor certification specific to NERC to support our ICP. This is being worked on by WECC.
9	Needs to be consistent across all reagions.
10	NERC Certification is an adequate level of training for operators, and entities should not be required to go beyond that level of training unless NERC is clear about that expectation.
11	NERC has a commendable operator training and certification program and a continuing education (CE) program to maintain certification.
12	NERC has a commendable operator training and certification program and a continuing education (CE) program to maintain certification.
13	NERC initially provided some training and information but they seem to be backing away from this. WECC is providing excellent training and "Train the Trainer" workshops.
14	NERC Q3: The NERC Continuing Education Program is well defined and documented. However, we are not aware of NERC conducting periodic audits of any NERC CEH approved provider to ensure that they are following all requirements.
15	NERC reliability standards development workshops and webinars program provide useful information about NERC and the standards development process. NERC should place more emphasis on how entities can effectively perform to the standards and demonstrate compliance. NERC auditor training should be made available to registered entity representatives.
16	No Comment
17	None
18	NPCC provides compliance workshops, NERC provides training material per Webinars, RSAW's, auditor training for regional compliance staff.
19	SPP and NERC have continually stressed the importance of proper training of operators and documentation of the training.
20	SPP Compliance Workshops are an excellent sources for NERC standards, audit information, compliance expectations, etc
21	SPP is a party to the IRC Standards Review Comments, please refer to that submittal for our response to this question.
22	The continuing education program as implemented by NERC has been very successful in improving training for system operators across North America.
23	The NERC CEH program is well developed and documented. The requirements to obtain and maintain CEH status are well established ATC was recently audited and the audit guideline was well-defined.
24	This is applicable only to NERC. NERC has a very detailed and well documented continuing education program meeting the conditions of this statement.
25	We are not aware of any of these activities in NERC.

40. Comments and recommendations:	
	Response Count
	9
answered question	9
skipped question	133

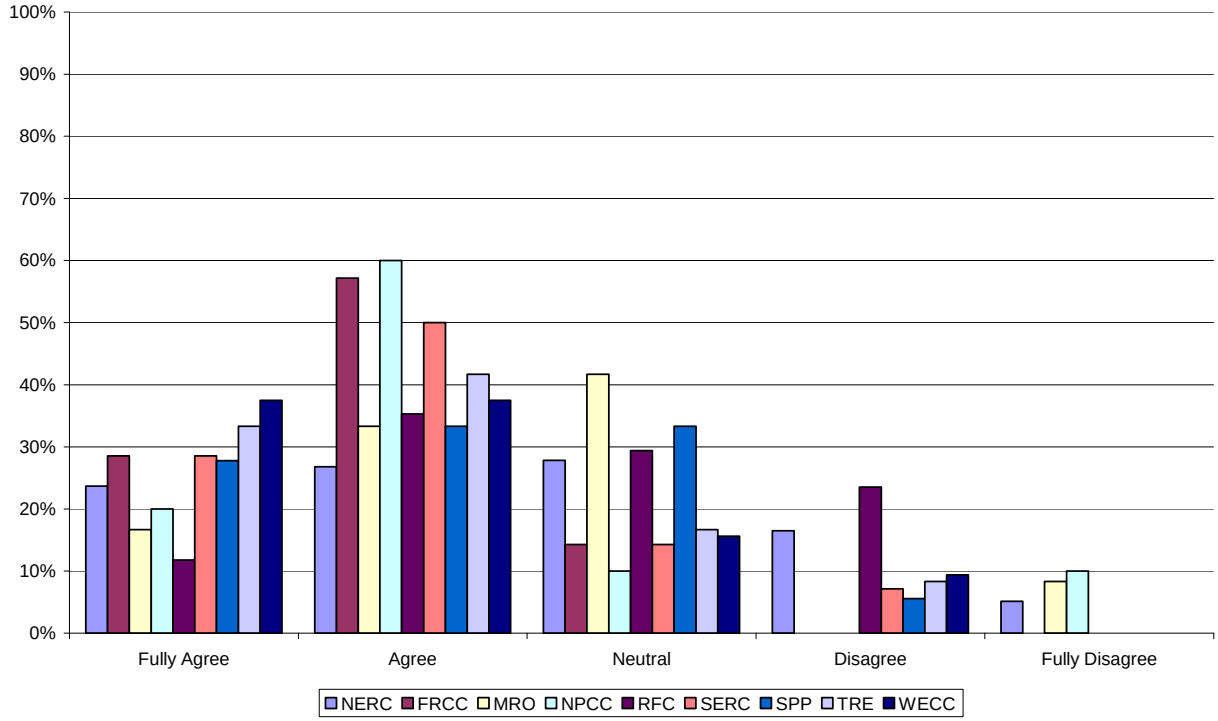
	Comments and recommendations:
1	Comment: There have been many positive attributes to ther CEH program for NERC Certified personnel. It allows for certian seldom done task to be refreshed.
2	NERC should conduct a survey similar to this one, but allow the responders to remain anonymous. It is very likely that NERC would receive different answers in such a survey.
3	none
4	None
5	None
6	None
7	Please see previous comment and suggestion.
8	There are no comments and/or recommendations at this time.
9	WECC needs to continue to be involved in dispatcher training and coordinating workshops.

Event Analysis

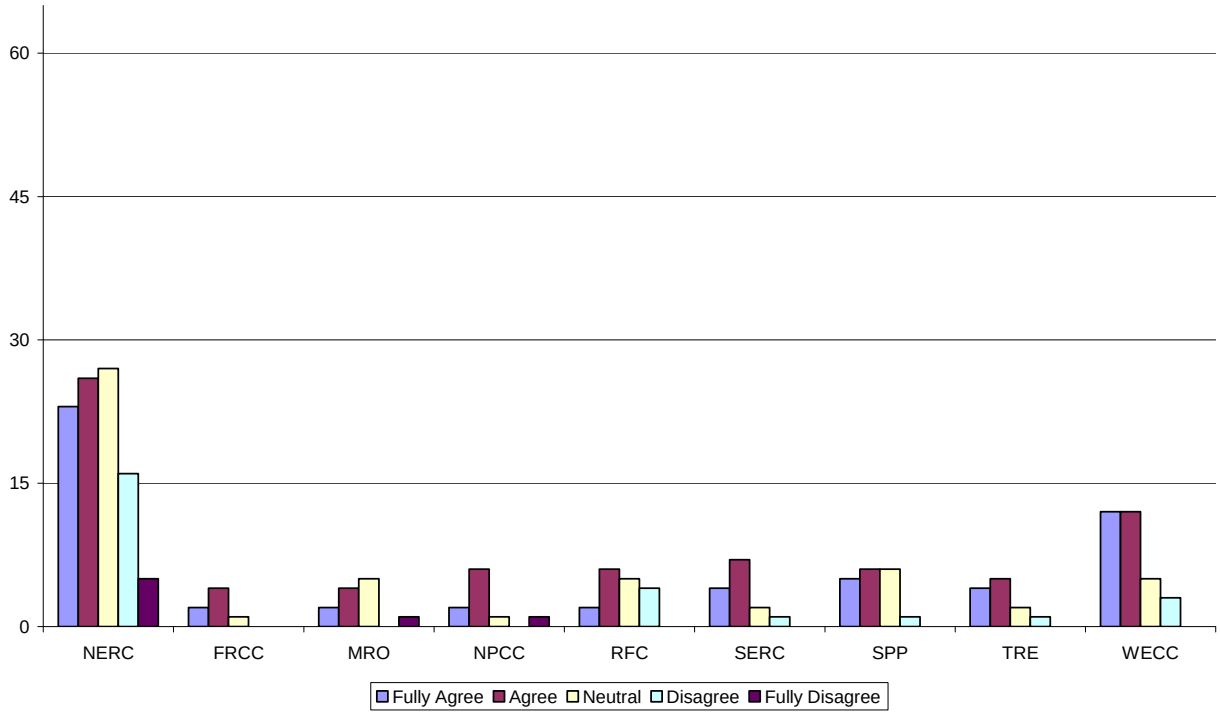
41. Develops and disseminates timely and useful information on system events that occur on the bulk power system, including information on root causes and lessons learned that is helpful to owners, operators and users in taking steps to prevent recurrence.

	NA – Not applicable or have no opinion	1 – Fully agree	2	3 – Neutral	4	5 – Fully Disagree	Response Count
NERC	12.6% (14)	20.7% (23)	23.4% (26)	**24.3% (27)**	14.4% (16)	4.5% (5)	111
FRCC	**81.6% (31)**	5.3% (2)	10.5% (4)	2.6% (1)	0.0% (0)	0.0% (0)	38
MRO	**70.7% (29)**	4.9% (2)	9.8% (4)	12.2% (5)	0.0% (0)	2.4% (1)	41
NPCC	**74.4% (29)**	5.1% (2)	15.4% (6)	2.6% (1)	0.0% (0)	2.6% (1)	39
RFC	**64.6% (31)**	4.2% (2)	12.5% (6)	10.4% (5)	8.3% (4)	0.0% (0)	48
SERC	**67.4% (29)**	9.3% (4)	16.3% (7)	4.7% (2)	2.3% (1)	0.0% (0)	43
SPP	**63.3% (31)**	10.2% (5)	12.2% (6)	12.2% (6)	2.0% (1)	0.0% (0)	49
TRE	**69.2% (27)**	10.3% (4)	12.8% (5)	5.1% (2)	2.6% (1)	0.0% (0)	39
WECC	**47.5% (29)**	19.7% (12)	19.7% (12)	8.2% (5)	4.9% (3)	0.0% (0)	61
					Comments and recommendations:		30
						answered question	**119**
						skipped question	**23**

ERO Survey - Event Analysis
Question 41



ERO Survey - Event Analysis
Question 41



	Comments and recommendations:
1	APPA's main concern is that the pace of publication of event analyses appears to have slowed. Preliminary assessments of the August 2003 balckout were released within months of the event. In contrast, to my knowledge a comprehensive report on the winter 2008 FPL relay event has yet to be posted.
2	Comments : The information NERC develops and disseminates as a result of Event Analysis is useful as lessons learned about what happened, what worked and what did not. The timeliness of disseminating the information needs significant improvement. The backlog of completion of the event analyses (i.e. MRO Separation Event from September 2007, Florida Blackout from February 2008) has delayed implementation of lessons learned in the industry in order to enhance reliability. In this regard, there needs to be more process improvement in order to ensure that events are analyzed according to a defined scope and projected schedule.
3	Complicated evaluations take time and NERC does an excellent job to analyze them. Regional analysis will be necessary to support smaller less complicated disturbances.
4	EEI believes that the information NERC develops and disseminates under its Event Analysis program is beneficial to bulk power system reliabiilty by providing valuable lessons learned about what happened, what worked, and what did not, as these events occur in the bulk power system. Recommendations made in event analysis reports should be supported by all participants of the event analysis group and be based on sound technical analyses and judgment. The timeliness of conducting the work and disseminating the information needs improvement. The backlog of completion of the event analyses has delayed the delivery of potentially valuable information to owners, users, and operators. In this regard, EEI believes that there may be a signficant need to clarify scope when initiating an event analysis, as well as setting deadlines and defining resource needs. Better defining these important activities upfront could avoid open-ended processes that unnecessarily delay the learning process, and better assist NERC in determining its resource needs.
5	Event analyses are of high quality which provide lessons-learned to prevent recurrence. The completion and dissemination of the event analyses are sometimes unnecessarily too long. If event analysis are expected to take a long period of time to complete, a process for issuing interim recommendations should be considered.
6	For significant bulk power system events, NERC leads the event analysis activities, and develops and disseminates useful information. During event analysis, NERC seeks active participation from the affected Facility Owners and Reliability Entities. The NERC-led event analysis takes long time, often over a year following the event. A more timely resolution will be helpful.
7	Good information. Preliminary reports are more concise and easy to read. The larger reports are often too detailed and arrive too after the fact. WECC does a pretty good job at this.
8	I have only seen one or two slides in a presentation given by the TRE. More would great.
9	Information is not disseminated really quickly enough, and information provided does not place lessons-learned in enough context to be useful.
10	NERC's Event Analysis web-page and NERC NEWS seem to be functioning efficiently.
11	OC and PC presentations related to analysis given by B. Cummings are excellent examples of NERC's fan out of information.
12	Process takes too long for results to be made public for the benefit of the industry. It appears that there needs to be better coordination between the Regions and NERC; better definition of roles for Regions, NERC, and FERC; and better clarity on when an investigation is needed.
13	Reports are not timely.
14	SPP and NERC's review, analysis and summary of system events has been helpful to CWL. All parties cooperated during the investigation for the overall benefit of CWL and other customers.
15	SPP is a party to the IRC Standards Review Comments, please refer to that submittal for our response to this question.
16	The FRCC and their committees do a good job both formally and informally communicating information on events and near misses.

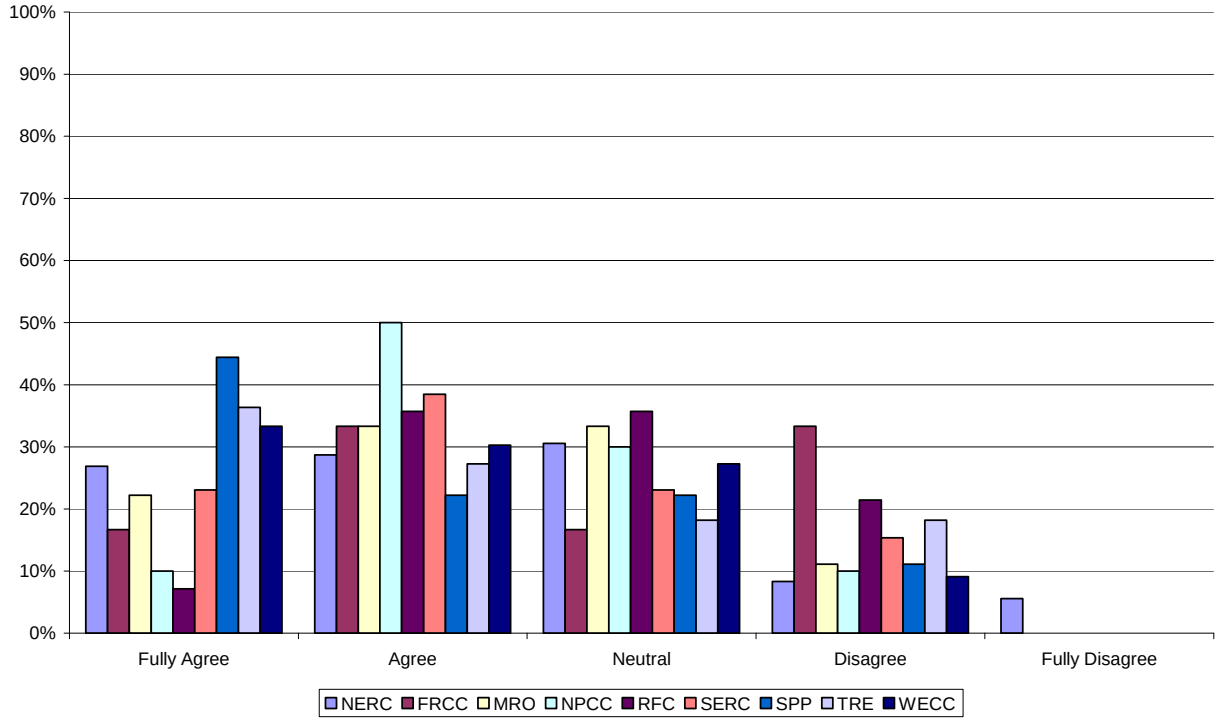
	Comments and recommendations:
17	The information is not developed and disseminated in a timely manner. While it is important to conduct events analysis in a thorough and accurate manner, it is also important to ensure that lessons learned that could help to prevent future events are quickly disseminated to the industry. It is often a very slow process. Concerns about confidentiality and potential compliance enforcement actions have also impeded information flow to the industry.
18	The information is useful, but it is not necessarily timely. Event analyses is valuable work, the challenge is that it takes an extensive period of time to get out a report. The time involved in putting the report out generally limits its effectiveness. Also, there should be pre-defined criteria when these are done. There should be some visibility of expenditures on event analysis and also the associated CVIs, which, in a large percentage of the time, follow an event review. As stated, event analysis reports become dated by the time these are released. The IESO strongly urges NERC to develop interim reports which would help the entities involved to establish a course of action and resolve issues in a timely and effective manner. Timely actions from affected entities are required as compared to producing long-awaited reports which serve no purpose to the affected entities except to act as teaching materials for table-top exercises.
19	The information is useful, but it is not necessarily timely. Event analyses is valuable work, the challenge is that it takes an extensive period of time to get out a report. The time involved in putting the report out generally limits its effectiveness. Also, there should be pre-defined criteria when these are done. There should be some visibility of expenditures on event analysis and also the associated CVIs, which, in a large percentage of the time, follow an event review. There should be a streamlined process to get early information out to the industry on what happened and what was learned by those experiencing the event.
20	The information NERC develops and disseminates as a result of Event Analysis is invaluable in developing lessons learned from major events. These are considered rare opportunities for the industry to gain insight into equipment failures, system relay settings, maintenance practices, operating procedures, etc. NERC must process these incidents in a robust technically sound manner that produces accurate analysis if the events and resulting root cause(s). For some events such as the Feb 2008 event in Florida, the reports can be lengthy and technically complex in order to evaluate the full nature and implications of the event. The report that the FRCC compiled along with NERC staff supported this well and is to be considered an excellent example of what NERC and the Regions can provide for lessons learned and initiatives for the future as a result. Although it was delayed in its outcome, it provides solid technical reporting of the events and root causes. NERC as the ERO along with the Regional Entity must be given their due deference for the evaluation, reporting and discerning of standard violations when major bulk power system events occur. NERC and the Regions are best positioned to make final determinations as to the validity of the final report as well as violations to standards. NERC as the ERO must ensure that all parties, including regulatory parties, are not allowed to have non-subject matter experts making decisions or judgements on post-system events surrounding the planning, engineering, operation and maintenance of the bulk power system.
21	The information NERC develops and disseminates as a result of Event Analysis is useful as lessons learned about what happened, what worked and what did not. However the recommendations coming out of the analysis are not useful in most part as they are based on incorrect assumptions that cause(s) of the event analyzed represent a general practice in the industry. Further, the recommendations should be supported by all participant of the event analysis group and should not promote a wish list of the few. The timeliness of disseminating the information needs significant improvement. The backlog of completion of the event analyses (i.e. MRO Separation Event from September 2007, Florida Blackout from February 2008) has delayed implementation of lessons learned in the industry in order to enhance reliability. In this regard, there needs to be a clarity in defining the scope of the analysis so that it does not become an open ended process and turn into a witch- hunt.

	Comments and recommendations:
22	The information NERC develops and disseminates as a result of Event Analysis is useful as lessons learned about what happened, what worked and what did not. However the recommendations coming out of the analysis are not useful in most part as they are based on assumptions that cause(s) of the event analyzed represent a general practice in the industry. Further, the recommendations should be supported by all participant of the event analysis group and should not promote a wish list of the few. The timeliness of disseminating the information needs significant improvement. The backlog of completion of the event analyses (i.e. MRO Separation Event from September 2007, Florida Blackout from February 2008) has delayed implementation of lessons learned in the industry in order to enhance reliability. In this regard, there needs to be clarity in defining the scope of the analysis. SERC: Effectively participates in NERC led Event Analyses. RFC: Effectively participates in NERC led Event Analyses
23	The investigations that determine root cause and lessons learned take far too long to determine and subsequently communicate. NERC has no effective process or procedure for event analysis. NERC is unclear about who leads the event analysis. And, there is a disconnection between event analysis and compliance investigations that inhibits the opportunity to learn and enhance reliability. NERC should either contract with professional root cause consultants or hire people with root-cause experience to conduct the formal analysis. There is no reason the root causes and lessons learned could not be determined and communicated in 1-2 months (as in the Nuclear Industry) instead of 1-2 years. Findings need to provide sufficient detail with the goal of improving reliability.
24	The technical side of WECC does provide timely information on system events. However, to date, industry has not seen compliance results of the system events that occurred in early 2008.
25	There used to be the Disturbance Assessment Working Group (DAWG) where disturbances and events were discussed and lessons learned were shared. Unfortunately that group does not appear to exist anymore.
26	This information is not being provided in a timely manner.
27	Timelyness needs to be improved.
28	To date the communication of events has been confusing and needs to be improved.
29	WECC does quick prelimanry disturbance report but final reports are very slow. All reports out of NERC are slow.
30	WECC, through its various subcommittees of the Operating Committee, does a nice job of fairly and accurately analyzing and communicating results of incidents and disturbances. This is extremely helpful to the industry participants, and is perhaps the most valuable service provided by WECC as an organization.

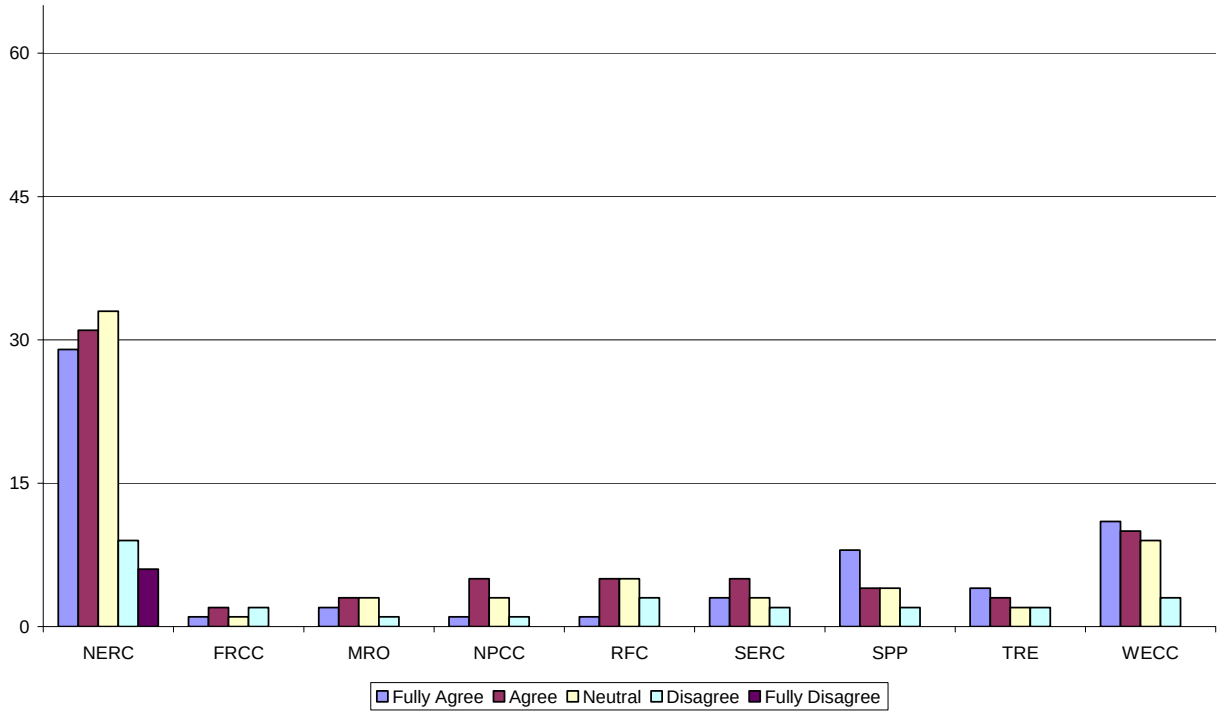
42. Develops and disseminates timely and useful alerts on risks and uncertainties potentially affecting reliable operation of the bulk power system, that are helpful to owners, operators and users in taking steps to preserve or improve reliability.

	NA – Not applicable or have no opinion	1 – Fully agree	2	3 – Neutral	4	5 – Fully Disagree	Response Count
NERC	6.1% (7)	25.2% (29)	27.0% (31)	**28.7% (33)**	7.8% (9)	5.2% (6)	115
FRCC	**83.8% (31)**	2.7% (1)	5.4% (2)	2.7% (1)	5.4% (2)	0.0% (0)	37
MRO	**78.0% (32)**	4.9% (2)	7.3% (3)	7.3% (3)	2.4% (1)	0.0% (0)	41
NPCC	**74.4% (29)**	2.6% (1)	12.8% (5)	7.7% (3)	2.6% (1)	0.0% (0)	39
RFC	**70.2% (33)**	2.1% (1)	10.6% (5)	10.6% (5)	6.4% (3)	0.0% (0)	47
SERC	**69.8% (30)**	7.0% (3)	11.6% (5)	7.0% (3)	4.7% (2)	0.0% (0)	43
SPP	**63.3% (31)**	16.3% (8)	8.2% (4)	8.2% (4)	4.1% (2)	0.0% (0)	49
TRE	**71.1% (27)**	10.5% (4)	7.9% (3)	5.3% (2)	5.3% (2)	0.0% (0)	38
WECC	**45.0% (27)**	18.3% (11)	16.7% (10)	15.0% (9)	5.0% (3)	0.0% (0)	60
					Comments and recommendations:		44
						answered question	**121**
						skipped question	**21**

ERO Survey - Event Analysis
Question 42



ERO Survey - Event Analysis
Question 42



	Comments and recommendations:
1	As of February 20, 2009, NERC Alerts that TANC has received haven't applied to TANC's business model despite their purported functional applicability. TANC believes that its purported obligation to acknowledge receipt within 24 hours of NERC Alerts classified as "Recommendation" or "Essential Action" is unfounded and provides no reliability benefits to the bulk power system. Furthermore, performing to such an obligation is highly infeasible for TANC since it has no 24x7 operations and therefore doesn't have the resources to timely acknowledge receipt using NERC's online acknowledgement tool.
2	As part of analysis of significant events, NERC develops and disseminates useful alerts. These alerts are disseminated as soon as they are developed, although the final report on the analysis may come later.
3	Comments : We have not seen that many alerts coming out as a result of the Event Analyses. However, we have concerns over the alerts process because of the lack of timeliness and because NERC insists on sending the alerts to the Compliance Contacts who may not be best suited to respond or to provide 24/7 coverage. Additionally, NERC has made many changes to the process without consulting stakeholders.
4	Concern over the NERC's insistance of contacting the Compliance Contact, who may not be the best suited to provide 24x7 coverage.
5	Development of the tool to address multiple notices being sent to the same owner of multiple entities needs to be accelerated.
6	Does TRE develop such information? If so, I am not aware of it.
7	Doug does a really good job on the CIP stuff.
8	EEI understands that there have been very few alerts issued as a result of analyses conducted under the the Event Analysis program. However, EEI does have general concern regarding the alerts process because of the lack of timeliness and the delivery and notification processes. Additionally, NERC has made changes to the process without consulting stakeholders.
9	Information is not disseminated really quickly enough, and information provided does not place lessons-learned in enough context to be useful.
10	Information notices disseminated up to this point have often been inadequate in their level of detail to help the industry understand the scope and appropriate actions to take.
11	Information should come from a single source such as the SPP RE. Confusion as to the response and timeframes can confuse some when the format may be different than normally received from the RE.
12	It is confusing that recommendations to industry require a 24 hour acknowledgement and possible sign off of when the issue is going to be addressed when it is only a recommendation and isn't enforceable.
13	Maybe reliability coordinators see these alerts, but I don't see them.
14	NERC Alert process is improving but not completely refined.
15	NERC alerts are useful in identifying potential cyber security vulnerabilities. It's unclear how the effectiveness or enforceability of NERC alerts will be viewed within the regional compliance programs.
16	NERC continues to make improvements to the alert process and has established a number of new processes. NERC should continue to provide additional clarity to the process and include input from the entities that receive them.
17	NERC continues to make improvements to the NERC Alerts notification system so that the industry receives timely alerts on risks to the Bulk Power System.
18	NERC has standardized the NERC alerts - and had training - which was extremely beneficial in determining required actions.
19	NERC has trouble determining relevancy, particularly across regions.
20	NERC is improving in this area. However, the alerts are high in numbers. Alerts should be sent out when there is a clear need and not to meet a monthly or weekly quota. Too many insignificant alerts may result in complacency in responding to more important alerts. If an alert relates to a serious issue that needs immediate attention then it should be sent out at any time; however if the alert is not time critical, the alert should be sent when it is most likely to be seen and to receive an appropriate response. Recently many alerts have been sent out on Friday evening which is a bad time for sending out alerts.
21	NERC is improving its Cyber Alert System. WECC relies on the BA operators to post WECC NET messages on any system issues.

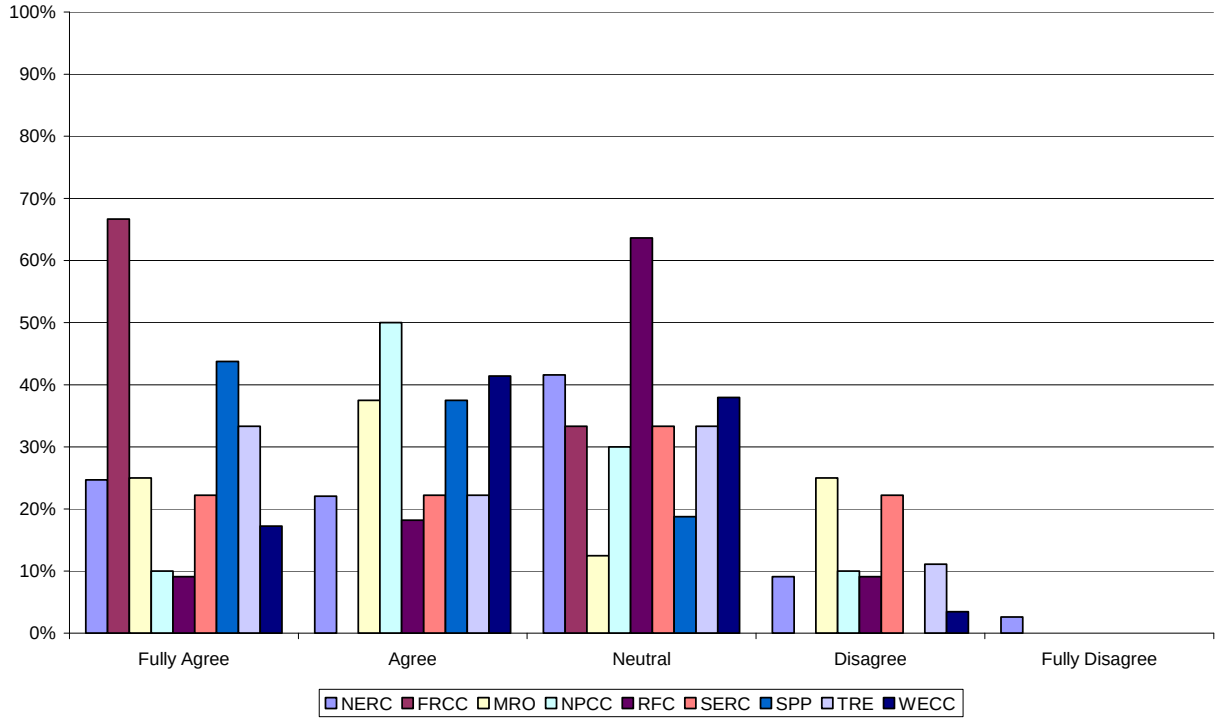
	Comments and recommendations:
22	NERC should establish clear and simple broadcast procedures for communicating alerts rather than establishing complex and protocol based broadcast mechanisms. The focus should be solely on relaying relevant information to the industry in a simple, direct, and efficient manner. It also appears that NERC is the sole generator of alerts. There should also be a mechanism in place for entities to report potential problems that could then be evaluated by NERC staff and appropriate experts as to the merit of the problem.
23	NERC should establish clear and simple broadcast procedures for communicating alerts rather than establishing complex and protocol based broadcast mechanisms. The focus should be solely on relaying relevant information to the industry in a simple, direct, and efficient manner. It also appears that NERC is the sole generator of alerts. There should also be a mechanism in place for entities to report potential problems that could then be evaluated by NERC staff and appropriate experts as to the merit of the problem. NERC should involve the industry in these processes. Industry involvement and feedback would make these efforts more efficient and practical.
24	NERC's recent modification to its Alert system was well designed. In addition, the webinar format and associated presentation were very well developed and professionally delivered.
25	Recent changes have improved the Alert system, continue to look for ways to improve it further.
26	Sending out so many alerts that in time they become nothing more than Spam!
27	SPP is a party to the IRC Standards Review Comments, please refer to that submittal for our response to this question.
28	The alerts are overused. Most address software patches that we received from our venders and installed many months before the alert. The alerts should be used only for emergencies or the will be dismissed similar to the boy who cried wolf
29	The alerts are too verbose. They need to be streamlined.
30	The alerts come from various agencies and are sent to various parties within the utilities which causes confusion.
31	The alerts for cyber security issues/processes are still evolving. The lack of clarity on expectations needs to be remedied as soon as possible. NERC is always sending alerts and they may need to more closely evaluate who they are sending them to.
32	The alerts have been issued in a timely manner and have been straight forward with the actions necessary to protect the bulk power system.
33	The Cyber Alert process is getting up and running and will be helpful. It should be revised so that the Alerts can be acknowledged via other web connected devices than just computers.
34	The NERC Alert Process seems to be functioning efficiently (with the exception of the most recent/2-19-09 NERC Alert - Advisory which did not include the Informational Send shortly after the Primary Send). IMEA recommends that NERC System Maintenance and RFI's from ES-ISAC be sent to the Primary Compliance Contacts, and not to the NERC Alert Contact Registration list since this is not the purpose of that list.
35	The NERC Alerts process needs improvement. Dissemination is scattered at best.
36	The NERC Alerts system needs some refining. It will be an effective avenue once fully established.
37	The NERC CIPC cyber alerts are not useful at all. All other areas are more useful. The WECC information coming from the RC has been right on target.
38	The recently implemented NERC Alerts program is expected to improve the dissemination of information. However, in general, NERC's industry operating experience program is not sufficiently developed to assure the timely dissemination of lessons-learned and industry experiences.
39	TOO MANY. IT BECOME OVERWELLING ARE WE GOING TO BE ALETS TO DEATH. NEED A FULL TIME PERSONS AOUND THE CLOCK TO HANDLE THE SAME. AS AN SMALL UTILITY BECOME VERY COSTLY. WAIT AND SEE WHAT THE FUTURE HOLDS
40	We are becoming concerned that some alerts are not useful (i.e Cry Wolf effect)
41	We have not seen that many alerts coming out as a result of the Event Analyses. However, we have concerns over the alerts process because of the lack of timeliness and because NERC insists on sending the alerts to the Compliance Contacts who may not be best suited to respond or to provide 24/7 coverage. Additionally, NERC has made many changes to the process without consulting stakeholders.

	Comments and recommendations:
42	We have not seen that many alerts coming out as a result of the Event Analyses. However, we have concerns over the alerts process because of the lack of timeliness and because NERC insists on sending the alerts to the Compliance Contacts who may not be best suited to respond or to provide 24/7 coverage. Additionally, NERC has made many changes to the process without consulting stakeholders.
43	WECC does a good job of reinforcing NERC Alerts in the CIP sector.
44	Work is needed in this area and we know that NERC realizes it shortcomings in this area.

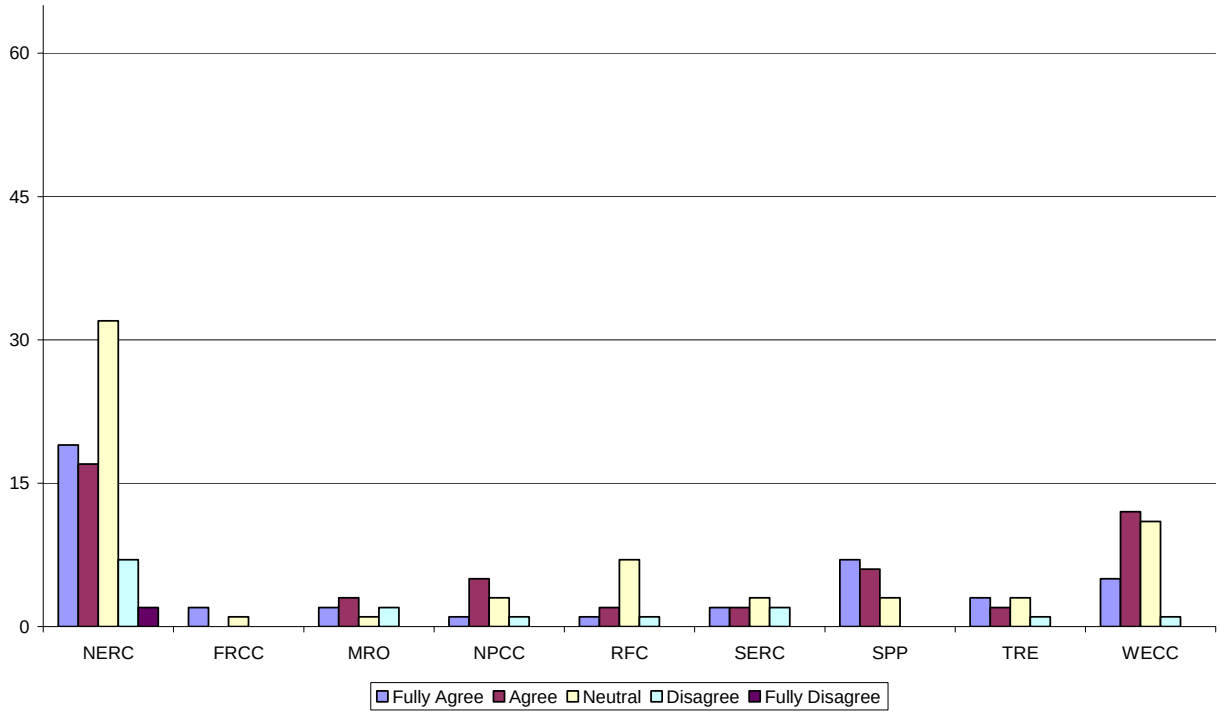
43. Provides an effective means of tracking recommendations to ensure completion as needed to ensure reliability of the bulk power system.

	NA – Not applicable or have no opinion	1 – Fully agree	2	3 – Neutral	4	5 – Fully Disagree	Response Count
NERC	**30.0% (33)**	17.3% (19)	15.5% (17)	29.1% (32)	6.4% (7)	1.8% (2)	110
FRCC	**91.9% (34)**	5.4% (2)	0.0% (0)	2.7% (1)	0.0% (0)	0.0% (0)	37
MRO	**80.5% (33)**	4.9% (2)	7.3% (3)	2.4% (1)	4.9% (2)	0.0% (0)	41
NPCC	**75.0% (30)**	2.5% (1)	12.5% (5)	7.5% (3)	2.5% (1)	0.0% (0)	40
RFC	**76.6% (36)**	2.1% (1)	4.3% (2)	14.9% (7)	2.1% (1)	0.0% (0)	47
SERC	**79.1% (34)**	4.7% (2)	4.7% (2)	7.0% (3)	4.7% (2)	0.0% (0)	43
SPP	**68.0% (34)**	14.0% (7)	12.0% (6)	6.0% (3)	0.0% (0)	0.0% (0)	50
TRE	**76.9% (30)**	7.7% (3)	5.1% (2)	7.7% (3)	2.6% (1)	0.0% (0)	39
WECC	**52.5% (32)**	8.2% (5)	19.7% (12)	18.0% (11)	1.6% (1)	0.0% (0)	61
					Comments and recommendations:		20
						answered question	**118**
						skipped question	**24**

ERO Survey - Event Analysis
Question 43



ERO Survey - Event Analysis
Question 43



	Comments and recommendations:
1	Comments : Exelon is not aware of any mechanism implemented by NERC for tracking recommendations nor does it see a need for one. The recommendations of the Event Analysis are not “requirements“ and therefore do not require tracking.
2	EEI is not aware of a mechanism implemented by NERC for tracking recommendations nor does it see a need for one. Recommendations made during a specific project under the Event Analysis program are not requirements and do not require tracking. As an alternative, it may be useful to consider providing an opportunity for a one-time followup interview and/or report, for example, one year following the issuance of the final report of the event.
3	EEI is not aware of any mechanism implemented by NERC for tracking recommendations nor does it see a need for one. The recommendations of the Event Analysis are not “requirements“ and therefore do not require tracking.
4	EEI is not aware of any mechanism implemented by NERC for tracking recommendations nor does it see a need for one. The recommendations of the Event Analysis are not “requirements“ and therefore do not require tracking. SERC effectively tracks recommendations on SERC Portal.
5	I am not aware of recommendations that have been tracked or the means by which such recommendations are being tracked.
6	In the new mandatory standards environment there seems to be less emphasis on learning lessons and preventing recurrence more emphasis on punishing those that had events for non-compliance.
7	Needs improvement on tracking recommmendations.
8	NERC NERC establishes reporting procedures with the affected entities as an effective means of tracking recommendations to ensure completion as needed. With the help of on-line databases, NERC should establish automated tracking mechanisms at a future time. NPCC NPCC establishes reporting procedures and updates on mitigation plans as an effective way of ensuring completion of tasks as stated in the mitigation plans.
9	NERC establishes reporting procedures with the affected entities as an effective means of tracking recommendations to ensure completion as needed. With the help of on-line databases, NERC should establish automated tracking mechanisms at a future time.
10	No Comment
11	None
12	SPP is a party to the IRC Standards Review Comments, please refer to that submittal for our response to this question.
13	The long-standing Recommendation Log managed by WECC Staff and the Operating Practices Subcommittee has been very effective in maintaining control of the outstanding recommendations and status updates.
14	The NERC Industry Alerts process has not yet established a track record but the program appears to contain attributes which should allow for the effective tracking of recommendations.
15	The structure for expected response from the industry is cumbersome and un-clear.
16	We are not aware of any such tracking system. WECC’s Disturbance Log provides a means of tracking recommendations addressing disturbances in the Western Interconnection.
17	We cannot comment because it is unclear which recommendations this question refers to - Alerts? Event Analysis Results?
18	We recommend that tracking be considered out of scope.
19	WECC's compliance portal becomes more and more useful as WECC enhances the services offered.
20	Work is needed in this area and we know that NERC realizes it shortcomings in this area.

44. Comments and recommendations:	
	Response Count
	12
answered question	12
skipped question	130

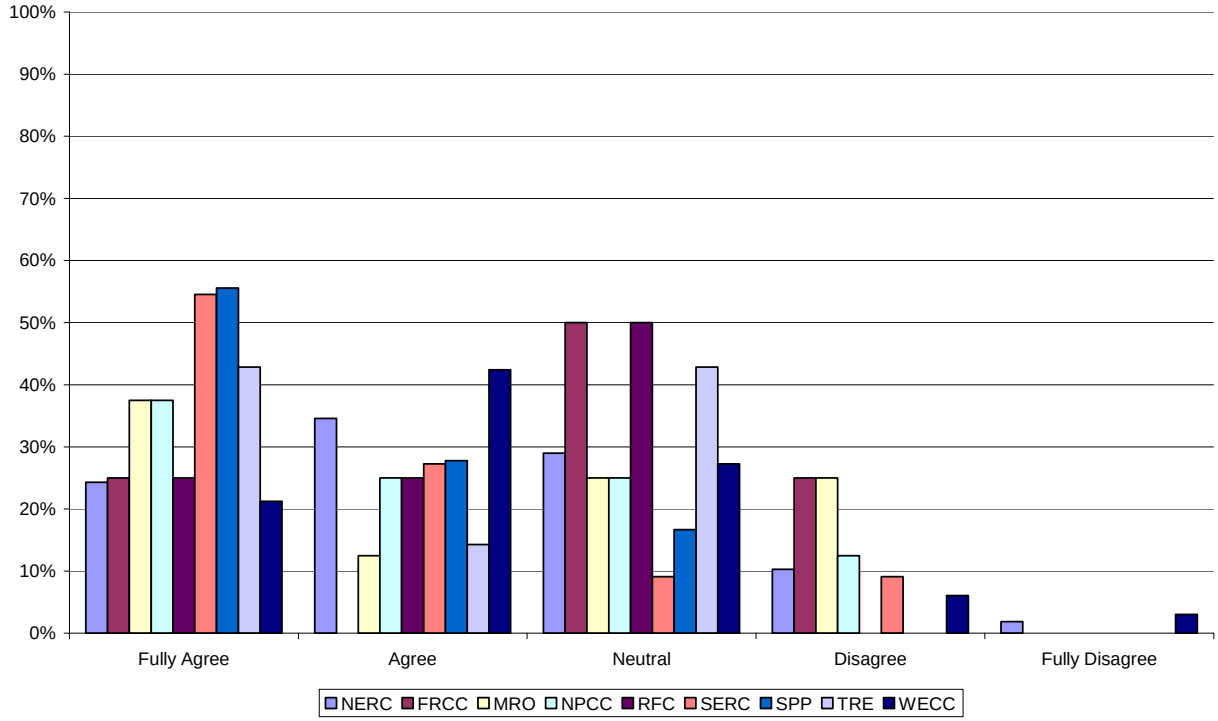
	Comments and recommendations:
1	1. Improve on timely completion of the Event Analyses and dissemination of the information to the industry. 2. Avoid including wish list in the recommendations. 3. Hold Webinars to disseminate the information.
2	1. Improve on timely completion of the Event Analyses and dissemination of the information to the industry. 2. Avoid including wish list in the recommendations. 3. Hold Webinars to disseminate the information.
3	EEI recommended during ERO formation and development of the NERC Rules of Procedure that the Events Analysis program needed various additional clarifications. EEI carries forward this recommendation, as well as the recommendation for improved timeliness.
4	NERC should conduct a survey similar to this one, but allow the responders to remain anonymous. It is very likely that NERC would receive different answers in such a survey.
5	none
6	None
7	None
8	Please see previous comments and recommendations.
9	See individual questions.
10	There are no comments and/or recommendations at this time.
11	There seems to be a disconnect between NERC alerts and actions that may result from event analysis. There should be Webinars to disseminate information.
12	WECC should create a process for distributing event analysis and lessons learned to all Registered Entities within a region for further internal distribution and application within the Registered Entities. WECC should also provide open-enrollment workshops that review disturbance events.

Critical Infrastructure Protection

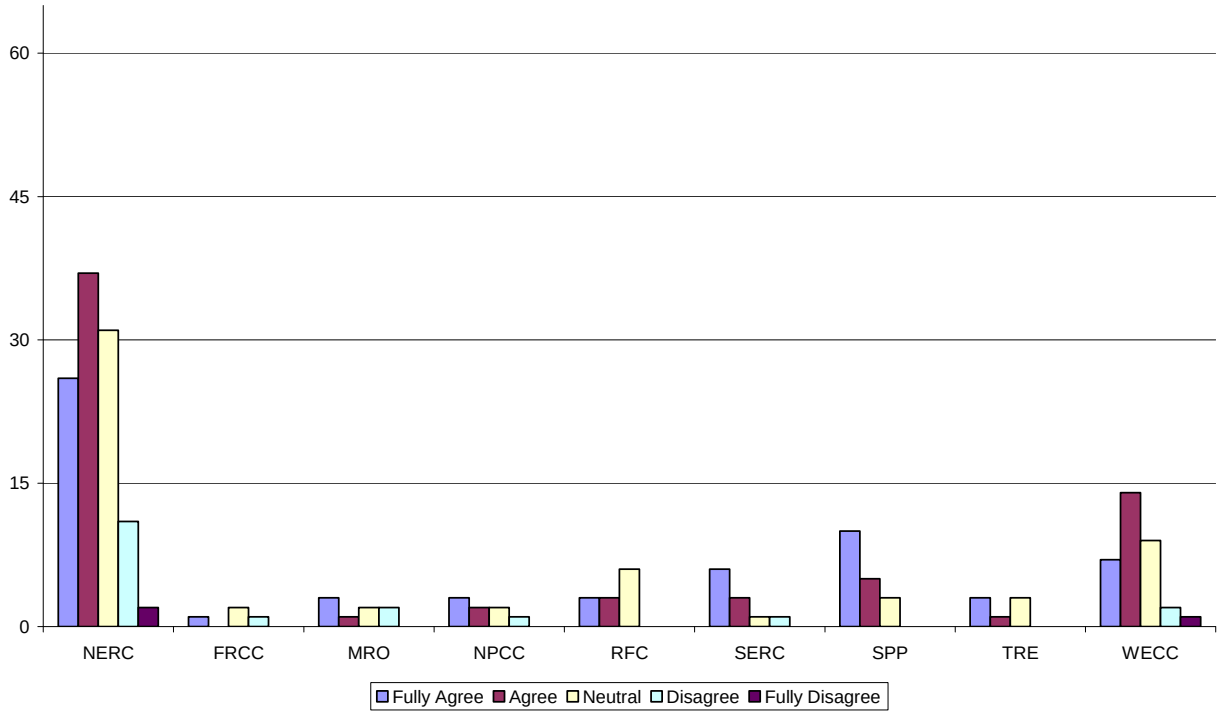
45. Has been effective as a leader and facilitator of the industry's efforts to identify and protect bulk power system critical infrastructure, including by identifying and publicizing threats to critical infrastructure.

	NA – Not applicable or have no opinion	1 – Fully agree	2	3 – Neutral	4	5 – Fully Disagree	Response Count
NERC	7.8% (9)	22.4% (26)	**31.9% (37)**	26.7% (31)	9.5% (11)	1.7% (2)	116
FRCC	**89.5% (34)**	2.6% (1)	0.0% (0)	5.3% (2)	2.6% (1)	0.0% (0)	38
MRO	**81.0% (34)**	7.1% (3)	2.4% (1)	4.8% (2)	4.8% (2)	0.0% (0)	42
NPCC	**80.0% (32)**	7.5% (3)	5.0% (2)	5.0% (2)	2.5% (1)	0.0% (0)	40
RFC	**75.0% (36)**	6.3% (3)	6.3% (3)	12.5% (6)	0.0% (0)	0.0% (0)	48
SERC	**75.0% (33)**	13.6% (6)	6.8% (3)	2.3% (1)	2.3% (1)	0.0% (0)	44
SPP	**63.3% (31)**	20.4% (10)	10.2% (5)	6.1% (3)	0.0% (0)	0.0% (0)	49
TRE	**81.6% (31)**	7.9% (3)	2.6% (1)	7.9% (3)	0.0% (0)	0.0% (0)	38
WECC	**46.8% (29)**	11.3% (7)	22.6% (14)	14.5% (9)	3.2% (2)	1.6% (1)	62
					Comments and recommendations:		28
						answered question	**120**
						skipped question	**22**

ERO Survey - Critical Infrastructure Protection
Question 45



ERO Survey - Critical Infrastructure Protection
Question 45



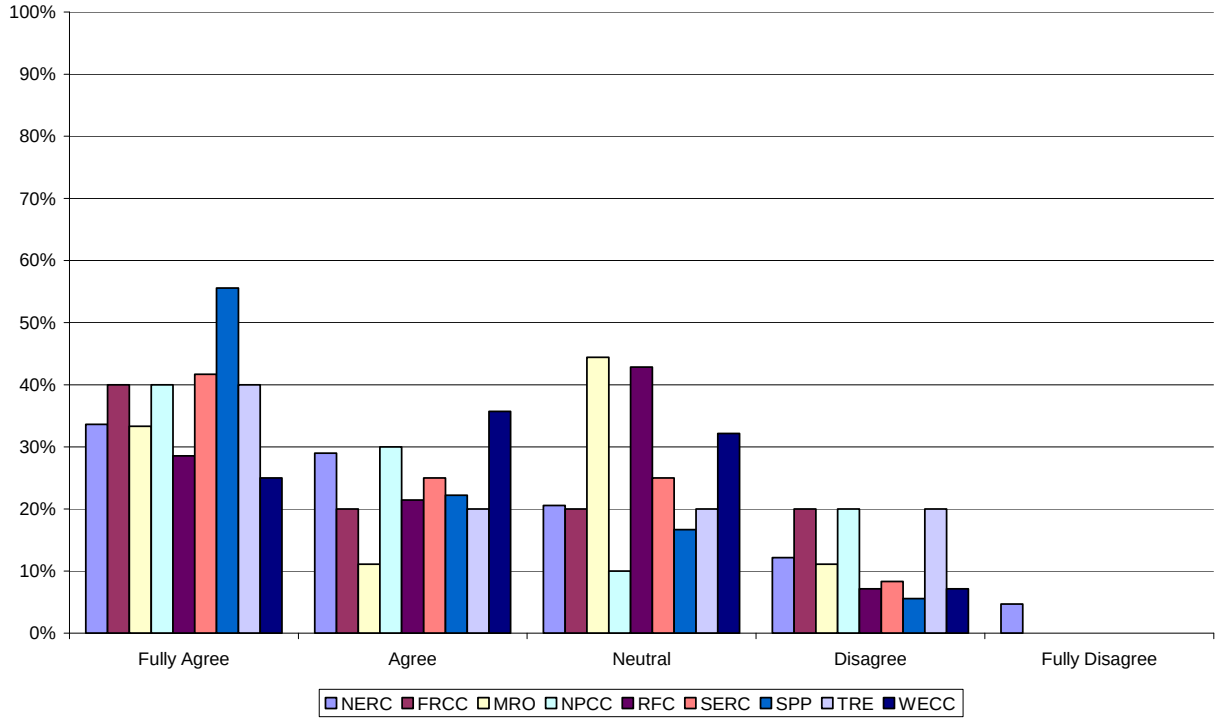
	Comments and recommendations:
1	CIPUGs have been very useful.
2	COMMENTS: Strong leadership and facilitation from NERC on critical infrastructure protection is essential to ensure that the industry receives consistent, credible information about strategies to protect bulk power system infrastructure. We have recently seen improvement in NERC's leadership in this area, but there is still much work to be done. Timely development of guidance, stronger direction to avoid costly and inefficient duplication of effort at the regions, and more effective facilitation and reliance on NERC technical committees and working groups are all needed to enhance industry efforts to protect bulk power system assets. Exelon feels that the workshops that have been held on the cyber standards have been effective in helping the industry to understand the regulatory requirements.
3	EEI strongly believes that leadership and facilitation from NERC on critical infrastructure protection is essential to bulk power system reliabiilty by ensuring that the industry receives consistent, credible information about strategies to protect bulk power system infrastructure. EEI member companies have recently observed great strides in NERC's leadership in this area, but there is still much work to be done. Timely development of guidance, stronger direction to avoid costly and inefficient duplication of effort at the Regional Entities, and more effective facilitation and reliance on NERC technical committees and working groups are all needed to enhance industry efforts to protect bulk power system reliability. EEI is disappointed in NERC efforts to date for facilitating the development of guidance that is needed for implementation of the CIP standards to meet the 2009 compliance deadline. Absent this critically important facilitation, Regional Entities are conducting their own efforts, where EEI is concerned that this could result in an inconsistent set of approaches to enforcing the standards.
4	NERC clearly dropped the ball on the Aurora Advisory but more recently has done well.
5	NERC has been diligently working to improve the industry security posture. It takes time and considerable NERC and industry effort to implement new standard, guidelines and appropriate publicizing of threats. NERC did not do a good job of documenting and communicating an overall security plan. Undue pressure by the USA Government and FERC, especially on cyber security, has and continues to create unrealistic time lines and workloads for NERC and industry. The result is a disorganized, inefficient, expensive and unrealistic approach to moving forward on cyber security in general. From a Canadian perspective, the dominance of one regulator FERC, is creating an industry problem. More cooperation is required by all parties to develop realistic objectives, plans and time lines.
6	NERC has demonstrated focus on CIP issues with establishing a Critical Infrastructure Program within NERC within dedicated staff.
7	NERC has made progress as the facilitator of industry efforts to identify and protect bulk power system critical infrastructure, including identifying and publicizing threats to critical infrastructure. However, NERC needs to fine tune its processes to eliminate process inefficiencies and maximize their effectiveness.
8	NERC has made progress as the facilitator of industry efforts to identify and protect bulk power system critical infrastructure, including identifying and publicizing threats to critical infrastructure. However, NERC needs to fine tune its processes to eliminate process inefficiencies and maximize their effectiveness. The goal should not be to just increase the number of requirements, but rather to have clear and targeted standards.
9	NERC Q1: NERC is making progress in the right direction. Improvements moving forward could be: timely development of guidance, stronger direction to avoid costly and efficient dupication of efforts at the regions, and more effective facilitation and reliance on NERC technical committees and working groups are all needed to enhance industry efforts to protect bulk power system assets.
10	NERC's program has improved significantly in recent month. Pending ES-ISAC communication pathways and procedures have been developed and tested. There are numerous issues remaining to be resolved, however.
11	Overall, the process is unorganized and needs to be improved. NERC and RFC management need to be pragmatic and focused on key activities that benefit reliability. The current process of using cyber security "insiders" with less than an adequate appreciation of the bulk electric system is problematic. More focus should be on protecting and improving reliability of the bulk electric system.
12	Past information has not been as helpful and coherent as it could have been. NERC Alerts are an improvement, as dissemination of information is fanned out in an effective manner.
13	Recent progress in this area, but still much work to be done.

	Comments and recommendations:
14	Security is a difficult thing to achieve. Too many "what if" scenarios. Improvements are being made. It would be nice to have a little more guidance on what is considered to be "Bulk Electric System". That is left to utilities to decide what they need to do. For sabotage, the DOE-417 form seems effective.
15	SPP is a party to the IRC Standards Review Comments, please refer to that submittal for our response to this question.
16	Still no proposal for assessing Critical Assets. No timeline published for finalizing any such assessment.
17	Strong leadership and facilitation from NERC on critical infrastructure protection is essential to ensure that the industry receives consistent, credible information about strategies to protect bulk power system infrastructure. We have recently seen great strides in NERC's leadership in this area, but there is still much work to be done. Timely development of guidance, stronger direction to avoid costly and inefficient duplication of effort at the regions, and more effective facilitation and reliance on NERC technical committees and working groups are all needed to enhance industry efforts to protect bulk power system assets.
18	Strong leadership and facilitation from NERC on critical infrastructure protection is essential to ensure that the industry receives consistent, credible information about strategies to protect bulk power system infrastructure. We have recently seen great strides in NERC's leadership in this area, but there is still much work to be done. Timely development of guidance, stronger direction to avoid costly and inefficient duplication of effort at the regions, and more effective facilitation and reliance on NERC technical committees and working groups are all needed to enhance industry efforts to protect bulk power system assets.
19	TAPS would like to see NERC to continue this and increase this role so that NERC is always the "go-to" entity and not FERC.
20	The Cyber Alert process is getting up and running and will be helpful. It should be revised so that the Alerts can be acknowledged via other web connected devices than just computers.
21	The leadership role is necessary to enhance security of the BES, but NERC is not yet provided the direction and guidance at this strong of level. Effective facilitation to avoid unnecessary duplication is needed.
22	The recently enhanced NERC Alert system should provide for better and more timely threat information. NERC must continue to reach out to industry groups that can provide additional technical knowledge and clarity of message.
23	The revised NERC Guidelines (in progress) on the identification of Critical Assets/Critical Cyber Assets will be helpful.
24	There needs to be a greater guidance and direction at both the NERC and regional level to eliminate costly and inefficient duplication of efforts
25	We feel that Critical Infrastructure Protection is an area where strong leadership from NERC would be the best way to ensure efficiency, adequacy and consistency across all regions. We believe that NERC has recently made a great stride in this area but still has a long way to go to implement completely. We like the progress to continue. SERC has done an adequate job to facilitate efforts in the region. Recently it has implemented a Pilot Review program for the CIP-002 standard.
26	WECC CIP Users Group is an important element that assists the industry in their implementation of processes for the CIP Standards. Staff is helpful (so far, during the pre-audit era) in answering questions and offering opinions to the entities.
27	WECC consistently provides useful compliance information to the industry through the use of their CIPUG email distribution lists and monthly user group meetings. In addition to the frequent emails and user group meetings, WECC provides additional notification of NERC advisories and links to CIPS related information/publications such as DHS.
28	WECC has stepped up its support of this process, but guidelines are only now coming out as to meeting the standards appropriately. NERC continues to make improvements to its NERC Alert system for timely notification of Cyber Events. There is concern that communications were unclear as to the vulnerabilities the industry was to address.

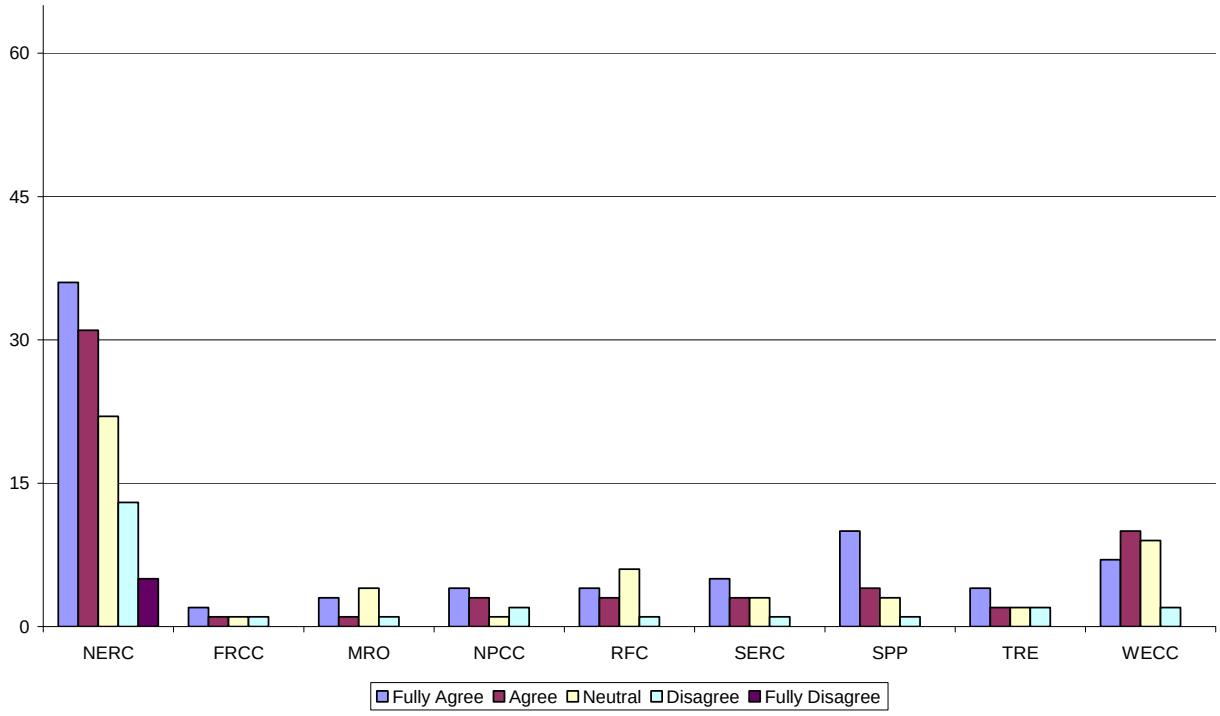
46. Provides cyber security alerts that are effective for notifying bulk power system owners, operators, and users of vulnerabilities and actions to address those vulnerabilities.

	NA – Not applicable or have no opinion	1 – Fully agree	2	3 – Neutral	4	5 – Fully Disagree	Response Count
NERC	7.8% (9)	**31.0% (36)**	26.7% (31)	19.0% (22)	11.2% (13)	4.3% (5)	116
FRCC	**86.8% (33)**	5.3% (2)	2.6% (1)	2.6% (1)	2.6% (1)	0.0% (0)	38
MRO	**78.6% (33)**	7.1% (3)	2.4% (1)	9.5% (4)	2.4% (1)	0.0% (0)	42
NPCC	**75.6% (31)**	9.8% (4)	7.3% (3)	2.4% (1)	4.9% (2)	0.0% (0)	41
RFC	**70.8% (34)**	8.3% (4)	6.3% (3)	12.5% (6)	2.1% (1)	0.0% (0)	48
SERC	**72.7% (32)**	11.4% (5)	6.8% (3)	6.8% (3)	2.3% (1)	0.0% (0)	44
SPP	**63.3% (31)**	20.4% (10)	8.2% (4)	6.1% (3)	2.0% (1)	0.0% (0)	49
TRE	**73.7% (28)**	10.5% (4)	5.3% (2)	5.3% (2)	5.3% (2)	0.0% (0)	38
WECC	**53.3% (32)**	11.7% (7)	16.7% (10)	15.0% (9)	3.3% (2)	0.0% (0)	60
					Comments and recommendations:		39
						answered question	**120**
						skipped question	**22**

ERO Survey - Critical Infrastructure Protection
Question 46



ERO Survey - Critical Infrastructure Protection
Question 46



	Comments and recommendations:
1	Advisories are too general and insufficiently targeted to functional elements of the industry. Not enough detail has been provided to ensure complete industry responses. While recently improving, there is too much confusion in the advisory process.
2	Alerts are too verbose. Need to be streamlined.
3	Although these are beginning to become a nuisance in some respects, the alerts are effective and necessary. NERC appears to have this well under control.
4	As of February 20, 2009, the NERC Alerts that TANC has received haven't applied to TANC's business model despite their functional applicability. TANC believes that its purported obligation to acknowledge receipt within 24 hours of NERC Alerts classified as "Recommendation" or "Essential Action" is unfounded and provides no reliability benefits to the bulk power system. Furthermore, performing to such an obligation is highly infeasible for TANC since it has no 24x7 operations and therefore doesn't have the resources to timely acknowledge receipt using NERC's online acknowledgement tool.
5	COMMENTS: An effective alerting process is the most essential tool in NERC's Critical Infrastructure Protection program, and Exelon believes there are several issues that have not yet been addressed: 1) Communications to stakeholders regarding process and requirements have been handled too casually and at times have been confusing, 2) transparent processes do not exist for how threats and vulnerabilities are evaluated and prioritized, and 3) entity compliance contacts are not being utilized as originally intended. An example of what is meant by issue #1 is the January 23, 2009 announcement that acknowledgements must be completed within 24 hours of receipt, instead of 72 hours, as previously communicated. This change had a large impact on stakeholders and it did not appear that NERC sought any input from industry before implementation. Regarding issue #2, there is a perception that no consultation is being sought with industry experts in order to evaluate risks and to prioritize the publication of alerts. While consultation may be happening, stakeholders have no assurance of it. There should be a documented process, transparent to stakeholders, on how threats and vulnerabilities are validated, assigned a "severity or risk", and prioritized in the case of multiple alerts. This process should also include how participants/consultants are selected and how the group of participants/ consultants will be maintained in the future. Regarding issue #3, the industry has repeatedly requested that: 1) NERC allow users, owners and operators to designate a single point of contact for receipt and acknowledgement of alert notifications; and 2) NERC work with owners, users, and operators to develop procedures for maintaining an accurate, up-to-date list of these single points of contact. Currently, NERC has required that the primary compliance contact be the primary recipient and responder. We do not feel this is appropriate. Nor do we feel it is appropriate to expect their email to be monitored on a 24x7 basis.

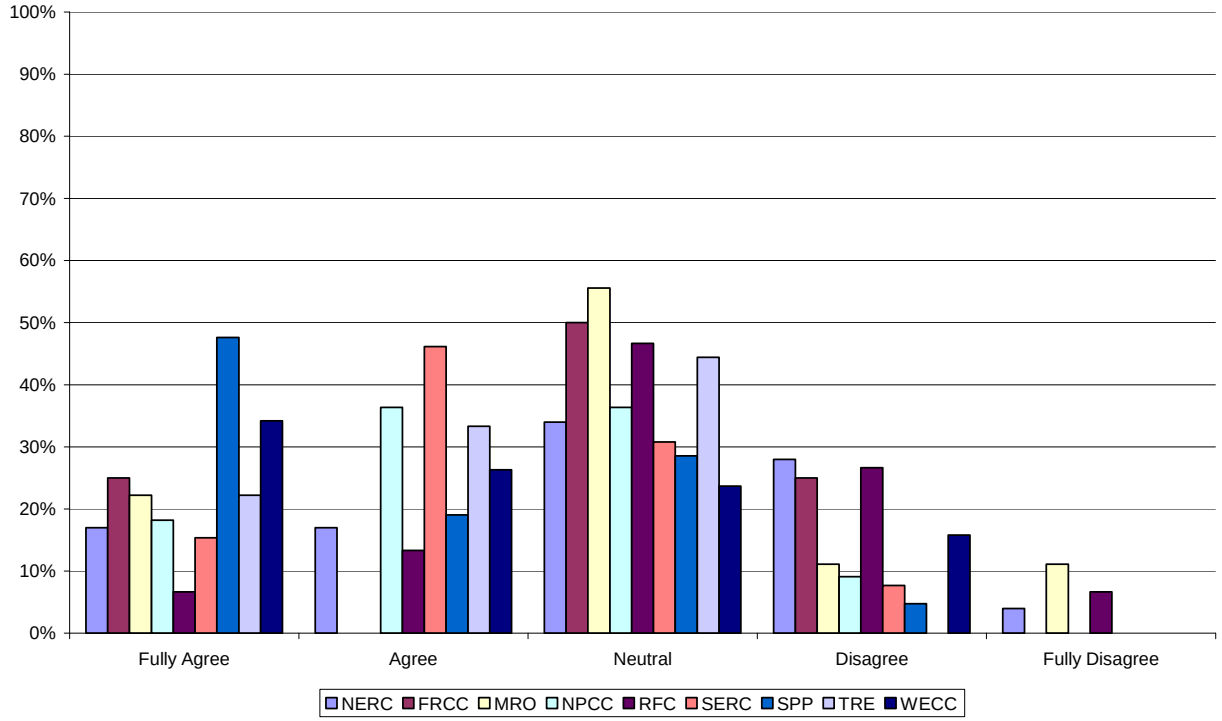
	Comments and recommendations:
6	EEI believes that the NERC Alert process has greatly improved in recent months and as modifications that have been promised are implemented effectively, EEI is confident that progress will continue to be made. However, EEI believes that this rating is appropriate in reflecting NERC performance during the three-year survey period. An effective alerting process is the most essential tool in NERC's Critical Infrastructure Protection program, and EEI believes there are three issues that have not yet been addressed: 1) Communications to stakeholders regarding process and requirements have been handled too casually, 2) transparent processes do not exist for how threats and vulnerabilities are evaluated and prioritized, and 3) entity contacts are not being utilized as originally intended. The following comments provide additional details. An example of communications being handled too casually is the January 23, 2009 announcement that acknowledgements must be completed within 24 hours of receipt, instead of 72 hours, as previously communicated. This change had a large impact on stakeholders and it did not appear that NERC sought any input from industry before implementation. Regarding transparency, stakeholders need assurances that Alerts have been appropriately evaluated and that considerations have been given to the impacts on reliability of the bulk electric system. There is a perception that no consultation is being sought with industry experts in order to evaluate risks and to prioritize the publication of alerts. EEI is aware that NERC is, in fact, utilizing various stakeholder groups for consultation; however, in order to ensure all stakeholders that an impartial assessment and prioritization is taking place when developing an Alert, the process should be clear to everyone, consistently applied, and transparent to stakeholders. The process should reflect the following criteria: • a balanced, impartial validation of each vulnerability or threat; • an appropriate cross-section of industry expertise, with diversity of functional entity types and individuals with an appropriate level of operational responsibility • selection process for participants/consultants and how the group will be maintained going forward: Regarding the handling of entity contacts for dissemination of Alerts, EEI has consistently requested that: 1) NERC allow users, owners and operators to designate a single point of contact for receipt and acknowledgement of Alert notifications; and 2) NERC work with owners, users, and operators to develop procedures for maintaining an accurate, up-to-date list of these single points of contact. Currently, NERC has required that the primary compliance contact be the primary recipient and responder. We do not feel this is appropriate. Nor do we feel it is appropriate to expect their email to be monitored on a 24x7 basis.
7	Has created confusion with NERC alert process.
8	I don't believe TRE distributes this information.
9	I have only received cyber security alerts from NERC and not from SERC.
10	I understand the critical nature, but a standardized method of distribution should take place for all matters related to reliability.
11	Improving on this, but needs more.
12	NERC Alerts are effective in notifying registered entities of vulnerabilities and required actions.
13	NERC continues to make improvements to its NERC Alert system for timely notification of Cyber Events.
14	NERC is effectively working on this item. It will take some time for the industry process to mature. Most cyber security alerts are already taken care of by other agencies, vendors or organizations.
15	NERC is improving!
16	NERC needs to address the entire picture of completing the reporting process when a level 2 or level 3 alert is processed. If an entity has not completed a mitigation by a certian date, the entity has been required to send a certified letter stating the proposed completion date. There are no provided follow up instructions on what (if any) requirements there are on completing the required action. ie, another certified letter sent to NERC stating actions are completed. I'm not sure why entities are required to send registered letters in the first place. NERCs Rules of Procedures (810) states entities need to update NERC with date and information. Why can't an e-mail satisfy this requirement? It is good that NERC publishes NERC Alerts, but Alerts should be informational sends or essential information that needs to be send to the industry immediately. An entity can look at an advisory and recommendation as the same level of importance.
17	NERC Q2: NERC shold reconsider using compliance contacts as the point of contact for alers. NERC should solicit appropriate contacts for cyber security alerts.

	Comments and recommendations:
18	NERC should establish clear and simple broadcast procedures for communicating alerts instead of establishing complex and protocol based broadcast mechanisms. The focus should be solely on relaying relevant information to the industry in a simple, direct, and efficient manner, and in doing so should not regard itself and act as an operator of the bulk electric system. Additionally, NERC has been less than open to industry comments on its process for Alerts. We have noticed that the bulk of the cyber alerts come out late in the day on Friday and then the industry is supposed to immediately respond within 24 hours. The timing of these alerts is indeed odd.
19	NERC should establish clear and simple broadcast procedures for communicating alerts instead of establishing complex and protocol based broadcast mechanisms. The focus should be solely on relaying relevant information to the industry in a simple, direct, and efficient manner, and in doing so should not regard itself and act as an operator of the bulk electric system. Additionally, NERC has not been responsive to industry comments on its process for Alerts.
20	NERC's recent modification to its Alert system was well designed. The webinar format and recent "Alerts" associated presentation were very well developed and professionally delivered.
21	New NERC Alerts process is not yet functioning properly. Notices are not getting to the primary and alternate contacts.
22	Please refer to response to question two on page 35.
23	R1. The requirement reguarding a 24hr response to Nerc Alerts should be reconsidered to allow small entities/municipals to respond the next full business day. Most small entities work mon-fri 8am-4pm & off on Holidays & weekends making it difficult to respond within a 24hr period to Alerts.
24	Recent alerts have not been as timely as they could be and some technical glitches occurred impacting on the distribution of alert messages at the time of our initial signup but have been corrected.
25	Some alerts may not be effective (ie Cry Wolf effect)
26	Some progress here, but needs more work.
27	SPP is a party to the IRC Standards Review Comments, please refer to that submittal for our response to this question.
28	The advisories and alerts do provide information and recommendations of actions to address, however, the notification process needs work.
29	The alerts are overused. Most address software patches that we received from our venders and installed many months before the alert. The alerts should be used only for emergencies or the will be dismissed similar to the boy who cried wolf
30	The Cyber Alert process is getting up and running and will be helpful. It should be revised so that the Alerts can be acknowledged via other web connected devices than just computers.
31	The NERC Alert process has greatly improved and as modifications are implemented effectively, progress will continue to be made. An effective alerting process is the most essential tool in NERC's Critical Infrastructure Protection program, and there are several issues that have not yet been addressed: 1) communications to stakeholders regarding process and requirements have been handled too casually, 2) transparent processes do not exist for how threats and vulnerabilities are evaluated and prioritized, and 3) entity contacts are not being utilized as originally intended.

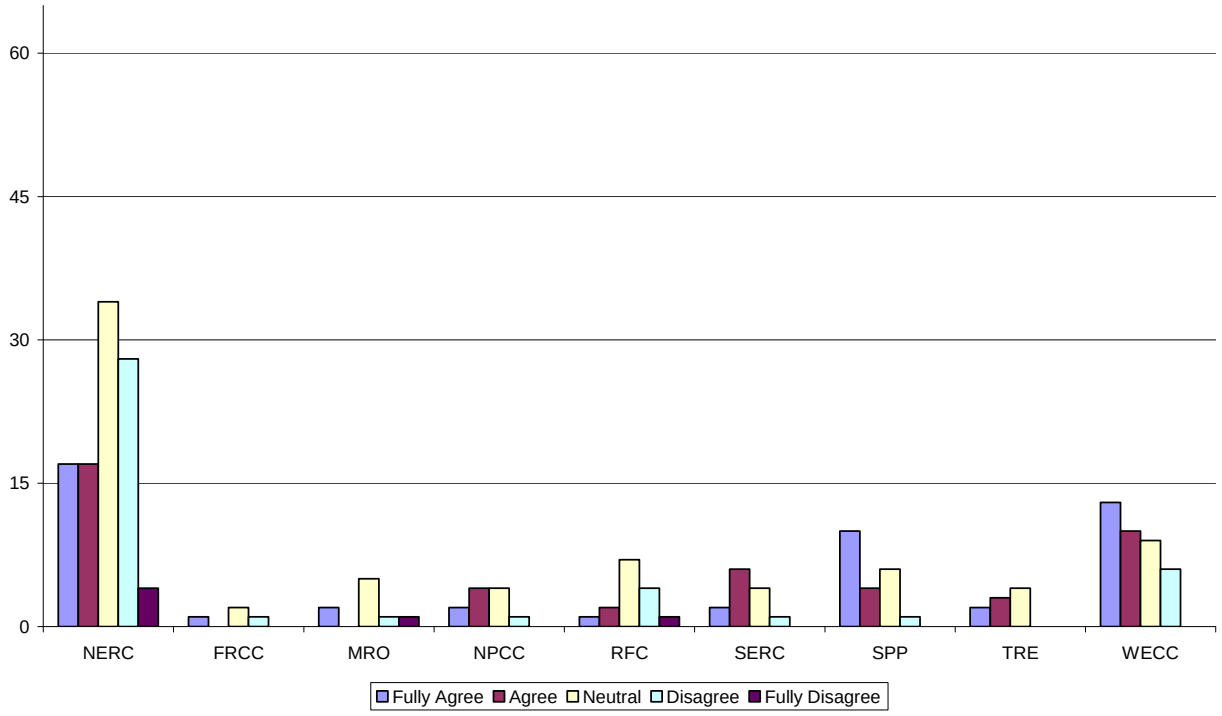
	Comments and recommendations:
32	The NERC Alert process has greatly improved in recent months and as modifications that have been promised are implemented effectively, EEI is confident that progress will continue to be made. An effective alerting process is the most essential tool in NERC's Critical Infrastructure Protection program, and EEI believes there are several issues that have not yet been addressed: 1) Communications to stakeholders regarding process and requirements have been handled too casually, 2) transparent processes do not exist for how threats and vulnerabilities are evaluated and prioritized, and 3) entity contacts are not being utilized as originally intended. An example of what is meant by issue #1 is the January 23, 2009 announcement that acknowledgements must be completed within 24 hours of receipt, instead of 72 hours, as previously communicated. This change had a large impact on stakeholders and it did not appear that NERC sought any input from industry before implementation. Regarding issue #2, there is a perception that no consultation is being sought with industry experts in order to evaluate risks and to prioritize the publication of alerts. While consultation may be happening, stakeholders have no assurance of it. There should be a documented process, transparent to stakeholders, on how threats and vulnerabilities are validated, assigned a "severity or risk", and prioritized in the case of multiple alerts. This process should also include how participants/consultants are selected and how the group of participants/ consultants will be maintained in the future. Regarding issue #3, EEI has repeatedly requested that: 1) NERC allow users, owners and operators to designate a single point of contact for receipt and acknowledgement of alert notifications; and 2) NERC work with owners, users, and operators to develop procedures for maintaining an accurate, up-to-date list of these single points of contact. Currently, NERC has required that the primary compliance contact be the primary recipient and responder. We do not feel this is appropriate. Nor do we feel it is appropriate to expect their email to be monitored on a 24x7 basis.
33	The NERC Alert process has greatly improved in recent months and it appears that progress will continue to be made. With that said, some concerns still exist: 1) Communications to stakeholders regarding process and requirements have been handled too casually; for example, acknowledgement within 24 hours /2 Use of the primary compliance contacts to send the alerts for acknowledgment. We believe that the entity (Compliance) contacts are not being utilized as originally intended. The compliance contact are not the right contacts as this is not a compliance issue.
34	The NERC Alert system, as presently formulated, does not allow for proper notification of the appropriate parties within each entity, within the tight time frame required for response. Nor does it provide sufficient guidance for remediation. That being said, the attempt to notify the industry of cyber events is noble.
35	The NERC CIPC cyber alerts are not useful at all.
36	The recent improvements to NERC's cyber security alerts system demonstrate that NERC is moving along a positive path.
37	There have been some incidents that affected the timeliness of electric sector notification of significant cyber security threats and vulnerabilities.
38	Too many alerts that were duplicative of US-CERT were issued in the fall /winter, but APPA expects such issues will be ironed out. Alertsneed to be targeted to specific classes of reliability functional entities (although some cyber alerts may address front-office vulnerabilities that may be presnt for all registered entities).
39	What alert systems there are, are not conveyed in a manner that differentiates them from standards (i.e. NERC alerts).

47. Provides useful guidance and information on how to comply with requirements of the CIP reliability standards.								
		NA – Not applicable or have no opinion	1 – Fully agree	2	3 – Neutral	4	5 – Fully Disagree	Response Count
	NERC	11.5% (13)	15.0% (17)	15.0% (17)	**30.1% (34)**	24.8% (28)	3.5% (4)	113
	FRCC	**89.5% (34)**	2.6% (1)	0.0% (0)	5.3% (2)	2.6% (1)	0.0% (0)	38
	MRO	**78.6% (33)**	4.8% (2)	0.0% (0)	11.9% (5)	2.4% (1)	2.4% (1)	42
	NPCC	**73.2% (30)**	4.9% (2)	9.8% (4)	9.8% (4)	2.4% (1)	0.0% (0)	41
	RFC	**68.8% (33)**	2.1% (1)	4.2% (2)	14.6% (7)	8.3% (4)	2.1% (1)	48
	SERC	**70.5% (31)**	4.5% (2)	13.6% (6)	9.1% (4)	2.3% (1)	0.0% (0)	44
	SPP	**57.1% (28)**	20.4% (10)	8.2% (4)	12.2% (6)	2.0% (1)	0.0% (0)	49
	TRE	**75.7% (28)**	5.4% (2)	8.1% (3)	10.8% (4)	0.0% (0)	0.0% (0)	37
	WECC	**41.5% (27)**	20.0% (13)	15.4% (10)	13.8% (9)	9.2% (6)	0.0% (0)	65
						Comments and recommendations:		39
							answered question	**119**
							skipped question	**23**

ERO Survey - Critical Infrastructure Protection
Question 47



ERO Survey - Critical Infrastructure Protection
Question 47



	Comments and recommendations:
1	(1) The standards are open to multiple interpretations and insufficient guidance is given as to which interpretation will be considered the most accurate. (2) The Tables for implementation are confusing. (3) WECC's efforts to provide information are appreciated, but WECC is challenged by changing interpretations at NERC's level.
2	After an initial "what" and "How" training by NERC and RFC, ther has been little, if any, followup guidance on CIP Compliance. NERC and the regions must take a stronger role in providing timely, consistent and reliable guidance on strategies for CIP compliance.
3	Although NERC and WECC have conducted outreach efforts to assist registered entities in complying with standards CIP-002-1 through CIP-009-1, it is still entirely too difficult for smaller registered entities to comply with these standards.
4	APPA lacks direct evidence on the effectiveness of the CIP communications effort.
5	AS A SMALL UTILITY IT HAS BEEN OVERWELMING PUTTING ALL DATA TOGETHER AND LEARNING THE COORECT/ACCETABLE DOCUMENTS TO BE IN COMPLAINCE. THERE SHOULD BEEN MORE OF START UP PERIOD FOR TRAINING AND FULL ENFORCEMENT WITH FINES Just needed more semairs. we all are learnig as we go includinG NERC AND RFC STAFF.
6	As stated previously, we feel that NERC has recently made great strides in leadership surrounding Critical Infrastructure Protection issues It is very important that industry receives timely guidance from NERC on how to comply with the CIP requirements. We are not looking for an overly specific guidance (cook-book) on how to comply, but are looking for a list of elements for compliance which would help in developing our processes, but should not be the only approach. So far the workshops and compliance meetings hosted by the regions has added great value. However, it is unclear if the guidance is consistent across all regions. We feel that a NERC-sponsored nationwide approach would have been more efficient and would have ensured consistency across all regions. SERC has established CSCAG (Critical Information System Compliance Advisory Group) to discuss and pursue activities related to development of and compliance with the CIP standards. SERC provides this information through Compliance Seminars and Open Forums.
7	As stated previously, we feel that NERC has recently made great strides in leadership surrounding Critical Infrastructure Protection issues. EEI believes that NERC's role is to act as a leader, coordinator, and facilitator of industry efforts, and should therefore assist entities in identifying strategies that are effective for securing their systems and complying with the requirements of the CIP reliability standards. We would encourage NERC to take on a stronger leadership role in the area of compliance guidance. It is very important for EEI members and all bulk power system entities to receive timely, consistent, and reliable guidance on strategies for complying with the requirements. The role of the regions in the area of guidance to registered entities is an area of particular concern. Workshops and compliance meetings hosted by the regions have added great value. However, it is unclear if the guidance is consistent across all regions. Additionally, a region by region approach to developing workshops and guidance is inefficient. We believe that a NERC-sponsored nationwide approach will ultimately be more efficient and will ensure consistency across all regions.
8	As with other standards, regulators are reluctant to provide clear guidance.
9	CIP-002 guidance is forthcoming from both WECC and NERC. That will be most helpful but it is late in the game for this guidance for Table 1 entities.
10	COMMENTS: Exelon believes that NERC's role is to act as a leader, coordinator, and facilitator of industry efforts, and should therefore assist entities in identifying strategies that are effective for securing their systems and complying with the requirements of the CIP reliability standards. We would encourage NERC to take on a stronger leadership role in the area of compliance guidance. It is very important for industry stakeholders to receive timely, consistent, and reliable guidance on strategies for complying with the requirements. The role of the regions in the area of guidance to registered entities is an area of particular concern. Workshops and compliance meetings hosted by the regions have added great value. However, it is unclear if the guidance is consistent across all regions. Additionally, a region-by-region approach to developing workshops and guidance is inefficient. We believe that a NERC-sponsored nationwide approach will ultimately be more efficient and will ensure consistency across all regions. Exelon is also concerned that NERC has been considering incorporating new NIST controls into the existing CIP standards. At a time when the industry is actively working to implement the systems, processes and procedures to comply with the existing standards, incorporating new controls would pose a significant change management challenge.

	Comments and recommendations:
11	Companies are left to develop thier own methodology under CIP 002 and nobody will tell you if it is okay or not.
12	EEI believes that NERC has recently made great strides in leadership surrounding Critical Infrastructure Protection issues. EEI believes that NERC's role is to act as a leader, coordinator, and facilitator of industry efforts, and should therefore assist entities in identifying strategies that are effective for securing their systems and complying with the requirements of the CIP reliability standards. We would encourage NERC to take on a stronger leadership role in the area of compliance guidance. It is very important for EEI members and all bulk power system entities to receive timely, consistent, and reliable guidance on strategies for complying with the requirements. The role of the Regional Entities in the area of guidance to registered entities is an area of particular concern. Workshops and compliance meetings hosted by the regions have added great value. However, it is unclear if the guidance is consistent across all regions. Additionally, a region by region approach to developing workshops and guidance is inefficient. We believe that a NERC-sponsored nationwide approach will ultimately be more efficient and will ensure consistency across all regions.
13	Guidance on complying with CIP standards has been facilitated thru FAQ's (Frequently asked Questions), RSAW's Regional Compliance Workshops, etc. The issue is the existence of CIP SME's at the regional offices to facilitate questions. The region also has published guidance on development of a risk-based methodology which identifies critical assets and critical cyber assets. Until the region performs CIP compliance reviews, post July 2009, the industry will not be able to review "lessons learned" from these reviews.
14	I am answering these questions as truthful as possible. I appologize for my scoring seeming critical but I have 23 years experience with our power system and I totally disagree with what mandates you have placed on our electric cooperative. It would be a little easier to accept if in fact we could even have an impact on the bulk electric system.
15	Industry and NERC was forced into fast development, approval and implementation of the CIP Standards. Many requirements and measures require additional work and guidance.
16	More guidance is necessary from both NERC and WECC. Interpretations concerning any CIPS related requests should be fast-tracked. Given the recent indications that the effective date for CIPS standards may be modified, the need for information and responses to questions in a timely manner will avoid the burdensome process of responding and tracking multiple Mitigation plans that will be caused by a delayed response to questions from the industry.
17	Needs improvment, industry wants to comply, but little guidance and information can be supplied by the Regions or NERC. Rules need to be changed.
18	NERC guidance on the CIP standards should be kept to the framework of the requirements and not be expanded beyond that framework. The information should provide clarity on a topic but should stop short of expressing specific solutions for compliance.
19	NERC has provided some useful guidance and information on compliance matters related to CIP standards. CIP standards are currently being modified with industry input and NERC should ensure that the modified requirements are clearly communicated to the industry. NERC needs to provide guidance to the industry on various CIP issues – standards and implantation issues. NERC should also take the initiative and publish technical white papers or guidance documents to help better understand technical matters behind certain CIP requirements if required or if confusion exists in the industry (Requests for CIP requirement interpretations could offer some idea of what the industry needs clarification on).
20	NERC has provided some useful guidance and information on compliance matters related to CIP standards. CIP standards are currently being modified with industry input and NERC should ensure that the modified requirements are clearly communicated to the industry. NERC needs to provide guidance to the industry on various CIP issues – standards and implementation issues. NERC should also take the initiative and publish technical white papers or guidance documents to help industry better understand technical matters behind certain CIP requirements if required or if confusion exists in the industry (Requests for CIP requirement interpretations could offer some idea of what the industry needs clarification on).

	Comments and recommendations:
21	NERC has recently made great strides in leadership surrounding Critical Infrastructure Protection issues. NERC's role is to act as a leader, coordinator, and facilitator of industry efforts, and should therefore assist entities in identifying strategies that are effective for securing their systems and complying with the requirements of the CIP reliability standards. NERC must take on a stronger leadership role in the area of compliance guidance. It is very important for all bulk power system entities to receive timely, consistent, and reliable guidance on strategies for complying with the requirements. The role of the regions in the area of guidance to registered entities is an area of particular concern. Workshops and compliance meetings hosted by the regions have added great value. However, it is unclear if the guidance is consistent across all regions. Additionally, a region by region approach to developing workshops and guidance is inefficient. A NERC-sponsored nationwide approach will ultimately be more efficient and will ensure consistency across all regions.
22	NERC provides useful guidelines to assist in compliance activities. They also sponsor seminars on the CIP standards and have offered official interpretations of standard requirements at the request of industry entities. We are looking for them to take more of a leadership role that will assist entities in maintaining the security of the BES. However, the CIP standards themselves are ambiguous which requires a lot of clarifications/explanations.
23	NERC Q3: Guidance documents were never finalized. FAQs answers were overridden by FERC order and FAQs were not rewritten. NERC should take a more aggressive leadership role in the area of compliance guidance.
24	Not clearly disseminated.
25	Recognizing that the CIP sector is still in the implementation phase, WECC has done and is doing a very good job in bringing entities together to achieve a thorough and common understanding of what is required and how to get there.
26	SPP CIPWG has provided "How To" workshops.
27	SPP is a party to the IRC Standards Review Comments, please refer to that submittal for our response to this question.
28	SPP personnel have been very helpful, responsive and patient.
29	The CIP standards are somewhat better than the other standards on providing compliance guidance but they have room for improvement.
30	The CIP standards need to be improved with better specificity. The current CIP standards require multiple guidance documents. Dual efforts on the standards and separate guidance frustrate clarity and diffuse subject-matter resources.
31	The current version of CIP standards leaves room for much interpretation. This, in general, is a desired approach because of the broad spectrum of assets across the many Registered Entities. The lack of clear guidance on what constitutes an appropriate Risk-based Methodology for CIP0-002-R1 leaves the door open for widely varying interpretations of what is required. This may result in similar assets being classified differently across similar Registered Entities.
32	The guidelines are beginning to come out and are offering information.
33	The NERC CIP implementation plan was confusing. WECC's lead CIP auditor is truly an expert in his field and has an exceptional dedication to education and outreach.
34	The Regional Entities, through the CIP RSAWs attempt to provide additional guidance but the existing cyber standards offer little guidance and much room for interpretation. Cyber security programs are being established, knowing that the standards are currently under major revisions.
35	The reluctance of NERC and WECC to provide support because of their audit posture has impeded the industry from getting straight answers and good examples of documentation and levels of performance.
36	There is room for interpretation which allows for a wrong assessment of whether or not you are a critical asset.
37	We are not aware of NERC or region sponsored useful guidance on HOW to comply with requirements. In fact, it seems that NERC has side-stepped responsibility for how to implement and has preferred to have requirements to prescribe WHAT needs to occur.
38	WECC - User workgroups have proven to be very valuable, as well as the Compliance User Group.
39	WECC's CIP Compliance User Group has been a god send in deciphering the CIP standards.

48. Comments and recommendations:	
	Response Count
	14
answered question	**14**
skipped question	**128**

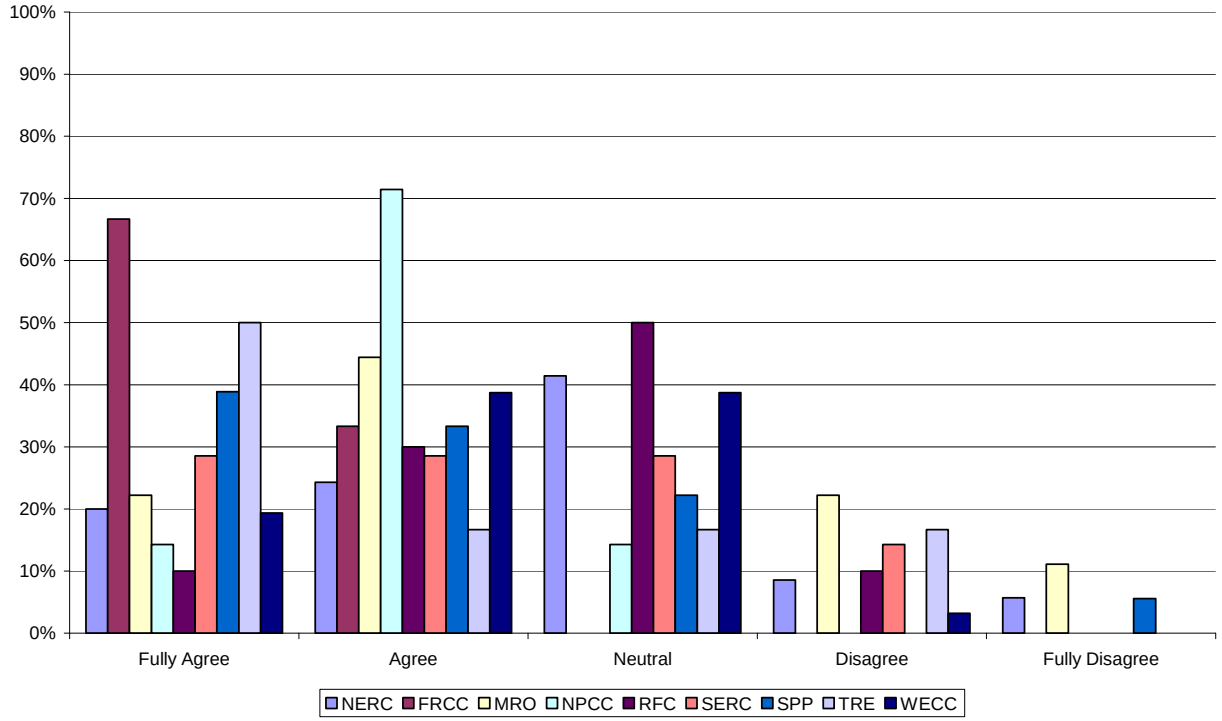
	Comments and recommendations:
1	NERC needs to work with stakeholders to develop advance workshops and guidance documents specifically for the CIP Standards.
2	NERC should conduct a survey similar to this one, but allow the responders to remain anonymous. It is very likely that NERC would receive different answers in such a survey.
3	none
4	None
5	None
6	None
7	Please see previous comment and recommendation.
8	Provide clear workable guidance on an appropriate Risk-based Methodology for CIP-002-R1. Flexibility is desired but the current lack of guidance should be addressed.
9	Recommendation 1) NERC should especially focus on getting its CIP reliability standards improved to make them clearer and avoid the need to develop numerous "guidance documents." In the meantime, NERC should work to ensure fair, consistent and effective compliance enforcement of the current CIP standards. Recommendation 2) NERC should strive to become a strong ERO that embodies the self regulatory model. The collective technical expertise and operational experience of the industry is critical to the efficient and reliable performance of the bulk electric system. Only when NERC itself is strong can its stakeholder-driven processes succeed. With an effective self regulatory organization, the FERC can properly serve in an appellate role. Recommendation 3) NERC should improve its operation of the Electric Sector – Information Sharing and Analysis Center (ES-ISAC) to ensure that its alerts and advisories are comprehensive and clearly actionable by those in the industry that are impacted.
10	SPP is a party to the IRC Standards Review Comments, please refer to that submittal for our response to this question.
11	The communication of alerts has actually allowed information which should remain confidential to be distributed to large audiences. Communication of alerts needs to be improved.
12	The current notification process does not provide for positive verification of the authenticity of any particular Alert. EEI recommends that NERC implement best practices commonly used in verifying message authenticity, in order to ensure that NERC Alerts can be positively authenticated by entities and cannot themselves be used as cyber attack vectors.
13	There are no comments and/or recommendations at this time.
14	WECC's CIP user group meetings have been very helpful in getting ideas from the industry. Tacoma Power encourages more of this type of assistance.

Situation Awareness

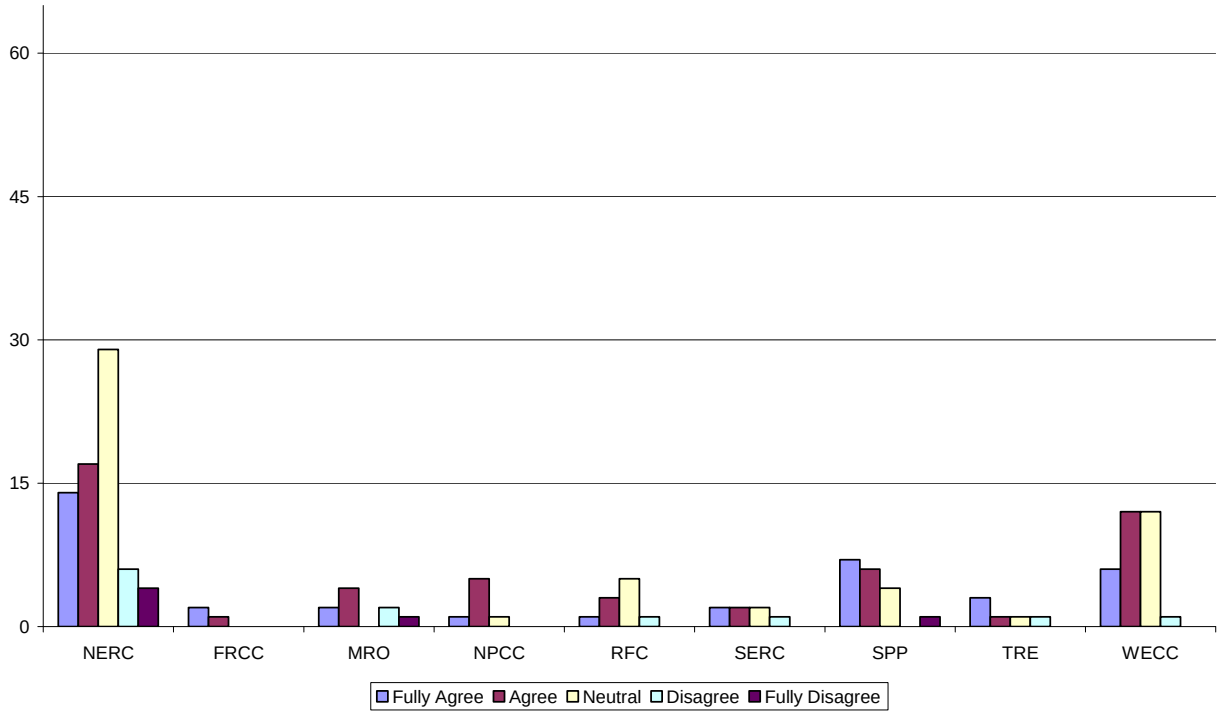
49. Provides useful information on system conditions in a timely manner to owners, operators and users and other interested entities during both normal and off-normal or emergency conditions.

	NA – Not applicable or have no opinion	1 – Fully agree	2	3 – Neutral	4	5 – Fully Disagree	Response Count
NERC	**34.0% (36)**	13.2% (14)	16.0% (17)	27.4% (29)	5.7% (6)	3.8% (4)	106
FRCC	**91.9% (34)**	5.4% (2)	2.7% (1)	0.0% (0)	0.0% (0)	0.0% (0)	37
MRO	**77.5% (31)**	5.0% (2)	10.0% (4)	0.0% (0)	5.0% (2)	2.5% (1)	40
NPCC	**82.5% (33)**	2.5% (1)	12.5% (5)	2.5% (1)	0.0% (0)	0.0% (0)	40
RFC	**78.7% (37)**	2.1% (1)	6.4% (3)	10.6% (5)	2.1% (1)	0.0% (0)	47
SERC	**83.7% (36)**	4.7% (2)	4.7% (2)	4.7% (2)	2.3% (1)	0.0% (0)	43
SPP	**64.0% (32)**	14.0% (7)	12.0% (6)	8.0% (4)	0.0% (0)	2.0% (1)	50
TRE	**83.8% (31)**	8.1% (3)	2.7% (1)	2.7% (1)	2.7% (1)	0.0% (0)	37
WECC	**50.0% (31)**	9.7% (6)	19.4% (12)	19.4% (12)	1.6% (1)	0.0% (0)	62
					Comments and recommendations:		27
						answered question	**114**
						skipped question	**28**

ERO Survey - Situation Awareness
Question 49



ERO Survey - Situation Awareness
Question 49



	Comments and recommendations:
1	Again, this probably goes to RCs.
2	ATC interfaces with our RC for system condition information, particularly during off-normal or emergency conditions. On the occasions when information has been provided regarding system conditions by NERC, MRO and/or RFC, the information has been timely and useful.
3	EEI understands that owners, users, and operators of the bulk power system strongly support the legacy NERC 'reliability toolbox' for its invaluable data and information. The 'reliability toolbox' includes the interchange distribution calculator (IDC), interregional security network (ISN), electronic tagging, system data exchange (SDX), reliability coordinator information system (RCIS), book of flowgates, NERC factor viewer, and the Reliability Coordinator hotline. These tools have been developed and maintained over the years as needs arose, all predating EPAct 2005 and Section 215. Companies need these tools to comply with technical requirements in mandatory reliability standards, while some support business functions (tagging). Since certification as the ERO under Section 215, EEI understands that NERC has discussed with federal agencies the agencies' desires for data and information related to 'situation awareness.' While the agencies can potentially better perform their responsibilities with additional information, EEI also sees a broad range of issues that need to be resolved. These include data management and confidentiality, conflicts of interest between NERC as a compliance enforcement entity and administrator of tools required by companies to comply with mandatory standards, budgets and cost allocation, coordination among federal agencies, NERC communication with stakeholders, and participation by stakeholders in the discussions with federal agencies.
4	EEI understands that owners, users, and operators of the bulk power system strongly support the legacy NERC 'reliability toolbox' for its invaluable data and information. The 'reliability toolbox' includes the interchange distribution calculator (IDC), interregional security network (ISN), electronic tagging, system data exchange (SDX), reliability coordinator information system (RCIS), book of flowgates, NERC factor viewer, and the Reliability Coordinator hotline. These tools have been developed and maintained over the years as needs arose, all predating EPAct 2005 and Section 215. Companies need these tools to comply with technical requirements in mandatory reliability standards, while some support business functions (tagging). Since certification as the ERO under Section 215, EEI understands that NERC has discussed with federal agencies the agencies' desires for data and information related to 'situation awareness.' While the agencies can potentially better perform their responsibilities with additional information, EEI also sees a broad range of issues that need to be resolved. These include data management and confidentiality, conflicts of interest between NERC as a compliance enforcement entity and administrator of tools required by companies to comply with mandatory standards, budgets and cost allocation, coordination among federal agencies, NERC communication with stakeholders, and participation by stakeholders in the discussions with federal agencies.
5	Event analysis is needed to understand and determine mitigation plans for regional or small area events related to firm power resources. A loss of a base resource affects cost which ultimately is paid by customers.
6	Exelon strongly supports the legacy NERC 'reliability toolbox' for its invaluable data and information. The 'reliability toolbox' includes the interchange distribution calculator (IDC), interregional security network (ISN), electronic tagging, system data exchange (SDX), reliability coordinator information system (RCIS), book of flowgates, NERC factor viewer, and the Reliability Coordinator hotline. These tools have been developed and maintained over the years as needs arose, all predating EPAct 2005 and Section 215. Companies need these tools to comply with technical requirements in mandatory reliability standards, while some support business functions (tagging). Since certification as the ERO under Section 215, Exelon understands that NERC has discussed with federal agencies the agencies' desires for data and information related to 'situation awareness.' While the agencies can potentially better perform their responsibilities with additional information, Exelon also sees a broad range of issues that need to be resolved. These include data management and confidentiality, conflicts of interest between NERC as a compliance enforcement entity and administrator of tools required by companies to comply with mandatory standards, budgets and cost allocation, coordination among federal agencies, NERC communication with stakeholders, and participation by stakeholders in the discussions with federal agencies. Furthermore, Exelon is concerned that adequate processes and procedures have not been established to define acceptable communication protocols during system events.

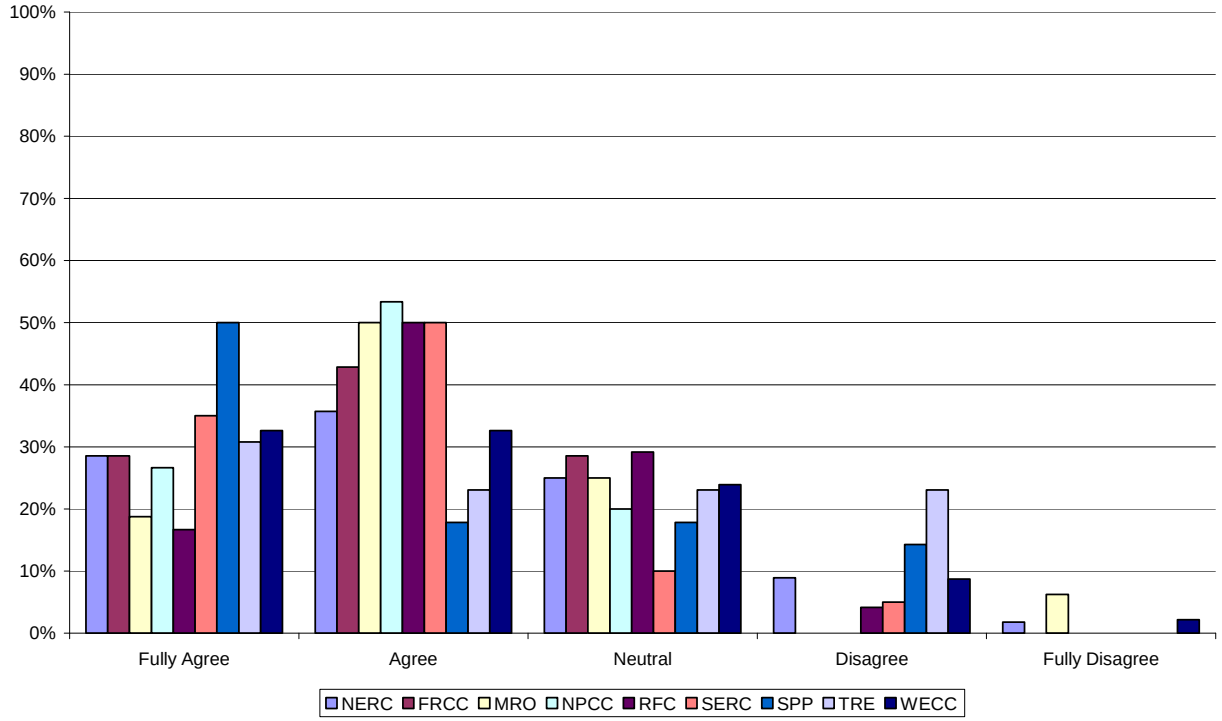
	Comments and recommendations:
7	FRCC does a great job at this. At the national level this is not easily accomplished and not clearly needed to ensure reliability.
8	I am confused on this question. If the question is "Does NERC and SERC provide Summer and Winter Assessments?" then I fully agree. If the question is "Does NERC and SERC provide information on system conditions for both normal, off-normal (???), and emergency conditions?" then the answer is no.
9	If this item is referring to NERC's IDC, and SDX, these tools work as expected. We are not aware that NERC or the REs plan to provide any other "information on system conditions... during both normal and off-normal or emergency conditions" nor should NERC or the REs. We do not believe that NERC interfere with the role and functions of the RCs.
10	Information during off-normal or emergency conditions may be available to the RCs, but most information available to TOPs is after the fact. Warnings regarding geo-magnetic storms is an exception.
11	NERC NERC provides useful and timely information on system conditions to owners, operators and users and other interested entities during normal and off-normal or emergency conditions. NERC needs to ensure that its messages reach the appropriate target audience in a direct and simplified manner.
12	NERC and SPP has worked well with CWL during normal and emergency conditions that had a potential to impact two balancing authorities.
13	NERC should consider whether sufficient situational awareness is provided by reliability coordinators, like RTOs.
14	NERC should not be sending out information regarding system conditions. This should be left with those operating the system.
15	None
16	Operational Information from the WECC Reliability Coordinators is useful and timely.
17	Owners, operators, and users should NOT be dependent on FERC, NERC, or the regions for information associated with off-normal and emergency conditions.
18	Real-time or close to real-time situation awareness is outside of NERC's scope. It is duplicative of the Reliability Coordinators, adds expense, and may actually interfere with system reliability.
19	SPP is a party to the IRC Standards Review Comments, please refer to that submittal for our response to this question.
20	The control centre staff have not seen power system information from NERC or the MRO that would provide increased or improved situational awareness.
21	The main entity that provides this information is the WECC RC Office, which is fairly new in its existence. Information appears to be adequate to this point.
22	The Reliability Coordinators provide useful and timely information on system conditions to owners, operators and users and other interested entities during normal and off-normal or emergency conditions. NERC itself has not. NERC however needs to ensure that its messages reach the appropriate target audience in a direct and simplified manner.
23	We believe that this is RC function and responsibility, particularly during emergency conditions. We agree that legacy NERC “reliability toolbox” (IDC, ISN, SDX, RCIS, etc) is valuable and facilitates situational awareness for operators. However, we do not believe that NERC/FERC participation, particularly during emergency situations would be helpful or appropriate. It could even become a hindrance to system recovery and restoration.
24	We do not receive information on current system conditions from either NERC or SPP. As a small LSE embedded in several Balancing Authorities, we may not be on the "routing list" for issues concerning the operation of the Bulk Electric System.
25	WECC produces a daily interconnection status report that is not very useful for operators.
26	Would prefer SPP system to be a push system rather than a pull system - i.e., send out alerts or messages regarding system conditions
27	Yes, from WECC

Stakeholder Communications and Public Relations

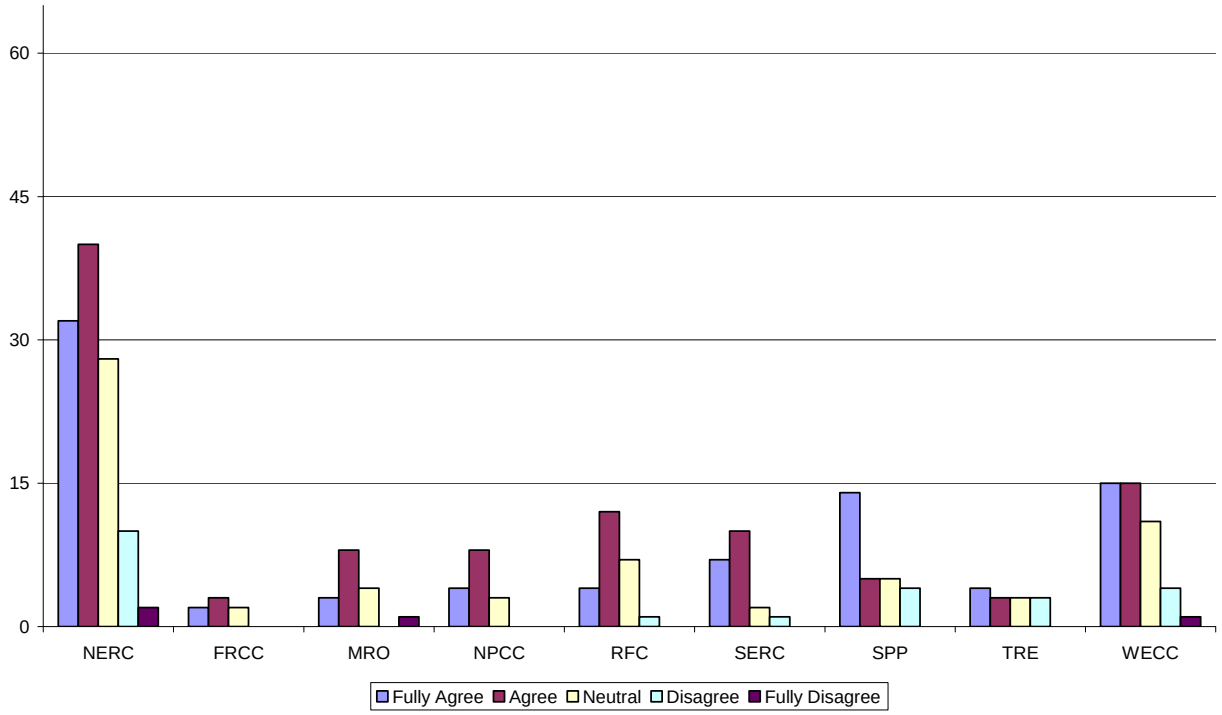
50. Provides a public and/or non-public website that is useful in meeting stakeholder needs and provides easy access to information.

	NA – Not applicable or have no opinion	1 – Fully agree	2	3 – Neutral	4	5 – Fully Disagree	Response Count
NERC	2.6% (3)	27.8% (32)	**34.8% (40)**	24.3% (28)	8.7% (10)	1.7% (2)	115
FRCC	**81.6% (31)**	5.3% (2)	7.9% (3)	5.3% (2)	0.0% (0)	0.0% (0)	38
MRO	**64.4% (29)**	6.7% (3)	17.8% (8)	8.9% (4)	0.0% (0)	2.2% (1)	45
NPCC	**63.4% (26)**	9.8% (4)	19.5% (8)	7.3% (3)	0.0% (0)	0.0% (0)	41
RFC	**51.0% (25)**	8.2% (4)	24.5% (12)	14.3% (7)	2.0% (1)	0.0% (0)	49
SERC	**55.6% (25)**	15.6% (7)	22.2% (10)	4.4% (2)	2.2% (1)	0.0% (0)	45
SPP	**46.2% (24)**	26.9% (14)	9.6% (5)	9.6% (5)	7.7% (4)	0.0% (0)	52
TRE	**65.8% (25)**	10.5% (4)	7.9% (3)	7.9% (3)	7.9% (3)	0.0% (0)	38
WECC	**29.2% (19)**	23.1% (15)	23.1% (15)	16.9% (11)	6.2% (4)	1.5% (1)	65
					Comments and recommendations:		38
						answered question	**119**
						skipped question	**23**

ERO Survey - Stakeholder Communication and Public Relations
Question 50



ERO Survey - Stakeholder Communication and Public Relations
Question 50



	Comments and recommendations:
1	1. Most information is available on the web-sites. The news postings on the web-sites are very helpful. 2. The NERC web-site is not organized in a way that makes information easy to find. 3. The FRCC web-site is not consistently kept updated.
2	1. NERC web site should be opening new windows in some cases. For example pdf documents should appear in a new window.
3	A one-stop shopping approach to reliability standards and associated compliance information would be helpful. Clicking on a reliability standard should bring the registered entity to the current standard, supporting documents/guides, links to the compliance elements such as VRFs and VSLs, the RSAWs and associated regulatory documents (FERC approval and FERC compliance decisions. The NERC web site is still difficult for industry participants to navigate, to find specific items.
4	Both NERC and NPCC website's are available for stakeholders.
5	Both NERC and WECC seem to try to provide a useful website but they have not considered how their actions impact tens of thousands of industrial participants. Both groups recently improved their website and interrupted all of the links that they had published to industry. This caused thousands of people to search for previous sites, find and replace links, etc.,all at a time when the industry is unable to hire adequate resources.
6	Both the NERC and FRCC website have improved considerably over the years. For the NERC website it is still sometimes difficult to get to specific information and the search tool provides limited functionality. Some items are still hidden away where you have to know where to look. Some items, like this survey, are posted in ideal format. This survey was posted as a PDF for offline use, but the check box was not set to make it saveable so that an entity can fill out the survey and share it around to get a consensus and wide range of feedback on the response. The FRCC Site has improved and continues to improve. We have direct interaction with the FRCC and provide feedback that is regularly incorporated into the site, so no specific feedback is provided here.
7	Both the NERC and WECC websites are difficult to use, despite recent improvements. Since NERC switched over to their new website, some of the links are still not working. As far as standards are concerned, we felt it was more helpful when they clearly identified the BOT approved dates and mandatory effective dates on the site next to the standard title. The sites also do not contain all information that a registered entity looks for.
8	EEI understands that organizing and communicating complex layers of information is very challenging. For those familiar with NERC, its processes and committee structure, and the issues, 'navigating NERC' can be accomplished with some degree of efficiency. For those unfamiliar with the structure and processes, finding things can be a daunting challenge. A 'roadmap,' or a better one, is needed.
9	EEI understands that organizing and communicating complex layers of information is very challenging. For those familiar with NERC, its processes and committee structure, and the issues, 'navigating NERC' can be accomplished with some degree of efficiency. For those unfamiliar with the structure and processes, finding things can be a daunting challenge. A 'roadmap,' or a better one, is needed.
10	Exelon understands that organizing and communicating complex layers of information is very challenging. For those familiar with NERC, its processes and committee structure, and the issues, 'navigating NERC' can be accomplished with some degree of efficiency. For those unfamiliar with the structure and processes, finding things can be a daunting challenge. Exelon feels that some of the Region websites, in particular SERC and TRE, are difficult to navigate. Due to the volume of information on these sites, locating a particular item can be a challenge.
11	Following the progression of standards through the stakeholder, approvals, and as filed at FERC is unnecessarily difficult with the technological approaches available.
12	For both NERC and WECC, ample notifications are made for comment and balloting of various development activities. This continues to be an effective process for NERC and WECC.

	Comments and recommendations:
13	For those familiar with NERC, its processes and committee structure, and the issues, 'navigating NERC' can be accomplished with some efficiency. For those unfamiliar with the structure and processes, finding things can be a daunting challenge. Improvement in this area such as a 'roadmap,' is needed. SERC website/portal is effective in meeting the needs. While it can be challenging for a new user to navigate through it, SERC provides training for its use at the seminars as well as through other forums. SERC staff is also available to provide help.
14	I assume the CDMS for non public?
15	I don't think the NERC website is easy to navigate. Items move occasionally and difficult to figure out where they moved to.
16	IMEA would appreciate easier access to the most recent NERC Guidelines (even if in draft form) for compliance with a specific reliability standards.
17	Information is difficult to find and often out-dated,
18	Information is not always easy to find on the public NERC website. The MRO website is better.
19	Information on the NERC website is not always easy to locate. The "Registered Entity public" has varying degrees of familiarity with the NERC website and all of the available documentation contained therein. It would be beneficial for NERC to proactively "market" the information available on the website through various approaches. A "did you know" tab on the website could provide instructions on how to locate information, an overview of what is available and why certain information is helpful to Registered Entities.
20	It is difficult to see what projects (outside of the standards development projects) are being pursued by NERC. In addition notifications asking for comments seem to depend on if you are on specific e-mail distribution lists. NERC needs to develop a central web-site that lists all the project currently being pursued and a notification system that will alert the industry of comment periods. (This could be modeled on the standards development web-site) In addition, all mandatory reliability standards should have a link to the FERC order approving the standard.
21	Love the SERC and now RFC portal compliance system.
3l5822	NERC --- NPCC NPCC provides a public and non-public website that is useful to meeting stakeholder needs. These websites also provide easy access to information. However, some of the information contained on the NPCC web-pages is dated especially on the non-public site and tracking system for changes to various criteria and directories could be made better – something like the one NERC has in place currently.
23	NERC – Individuals who were familiar with the previous NERC web site are having a hard time finding some information on the new web site.
24	NERC - The user interface of the updated website is a vast improvement.
25	NERC Q1: NERC should provide better guidance on how to navigate through it's resources for those less familiar with it's structure.
26	NERC's new website is not as intuitive and easy to use as the old website. WECC's website seems to consist mostly of several jumbled piles of information without any order or logic to them. The search functionality of WECC's site has no value or use.
27	SPP is a party to the IRC Standards Review Comments, please refer to that submittal for our response to this question.
28	The NERC and WECC websites are evolving and can be very difficult to navigate. Meeting references to "it's on the website" can turn into a frustrating search unless the path is fully qualified.
29	The NERC website is better and has make improvements. When you click on an email for an answer you usually get a quick response. TRE could improve their website, currently they are still a part of ERCOT's website. More tools and easier access would be nice.
30	The NERC website is very easy to navigate through. Additionally, SPP has a useful website.
31	The NERC website, while an enhancement from the original site, is still lacking in basic document identification and locating. NERC should consider stakeholder input sessions whereby entities can voice needs from the website and layout that would better serve the needs of the industry. Overall NERC has made good strides in these areas and should continue the improvements.
32	The NERC wesite still needs to be improved to make information easier to find.

	Comments and recommendations:
33	The website appears to be comprehensive, but it can be difficult to locate needed information. User feedback should be solicited on the redesigned website to improve the ease of finding resources.
34	The website is manageable if one knows what to look for, but it is not instructive.
35	WECC has a great website (the portal) with easy to find standards. However, their non-compliance website remains difficult to navigate. Tacoma POwer finds NERC's website to be hard to navigate. Particularly the section on balloting standards. Accessing that section requires a specific set of steps taken in a specific order and the steps are detailed in a pdf file. It would be helpful if the steps were more intuitive, or a detailed help screen was provided.
36	WECC's Regional website has been improving, however, when updated there have been errors in the links and the information is not well organized. This leads to difficulties in locating information that was accessible previously.
37	WECC's Web Portal is useful and the new compliance site is good, but WECC's library of documents needs to be better cataloged and indexed.
38	While the web site has improved it is still not very user freindly. For example, just to find the NERC roster takes several iterations. Several lists are not alphabetized.

51. Provides newsletters, conferences, and other stakeholder communications that are effective in providing stakeholders with useful and timely information regarding reliability and ERO/RE activities.

	NA – Not applicable or have no opinion	1 – Fully agree	2	3 – Neutral	4	5 – Fully Disagree	Response Count
NERC	8.0% (9)	**33.0% (37)**	**33.0% (37)**	21.4% (24)	4.5% (5)	0.0% (0)	112
FRCC	**84.2% (32)**	5.3% (2)	5.3% (2)	5.3% (2)	0.0% (0)	0.0% (0)	38
MRO	**64.4% (29)**	15.6% (7)	8.9% (4)	6.7% (3)	4.4% (2)	0.0% (0)	45
NPCC	**68.3% (28)**	12.2% (5)	14.6% (6)	4.9% (2)	0.0% (0)	0.0% (0)	41
RFC	**51.0% (25)**	12.2% (6)	26.5% (13)	10.2% (5)	0.0% (0)	0.0% (0)	49
SERC	**55.6% (25)**	22.2% (10)	15.6% (7)	6.7% (3)	0.0% (0)	0.0% (0)	45
SPP	**46.2% (24)**	32.7% (17)	15.4% (8)	5.8% (3)	0.0% (0)	0.0% (0)	52
TRE	**66.7% (26)**	15.4% (6)	10.3% (4)	7.7% (3)	0.0% (0)	0.0% (0)	39
WECC	**35.4% (23)**	30.8% (20)	21.5% (14)	9.2% (6)	3.1% (2)	0.0% (0)	65
					Comments and recommendations:		24
						answered question	**118**
						skipped question	**24**

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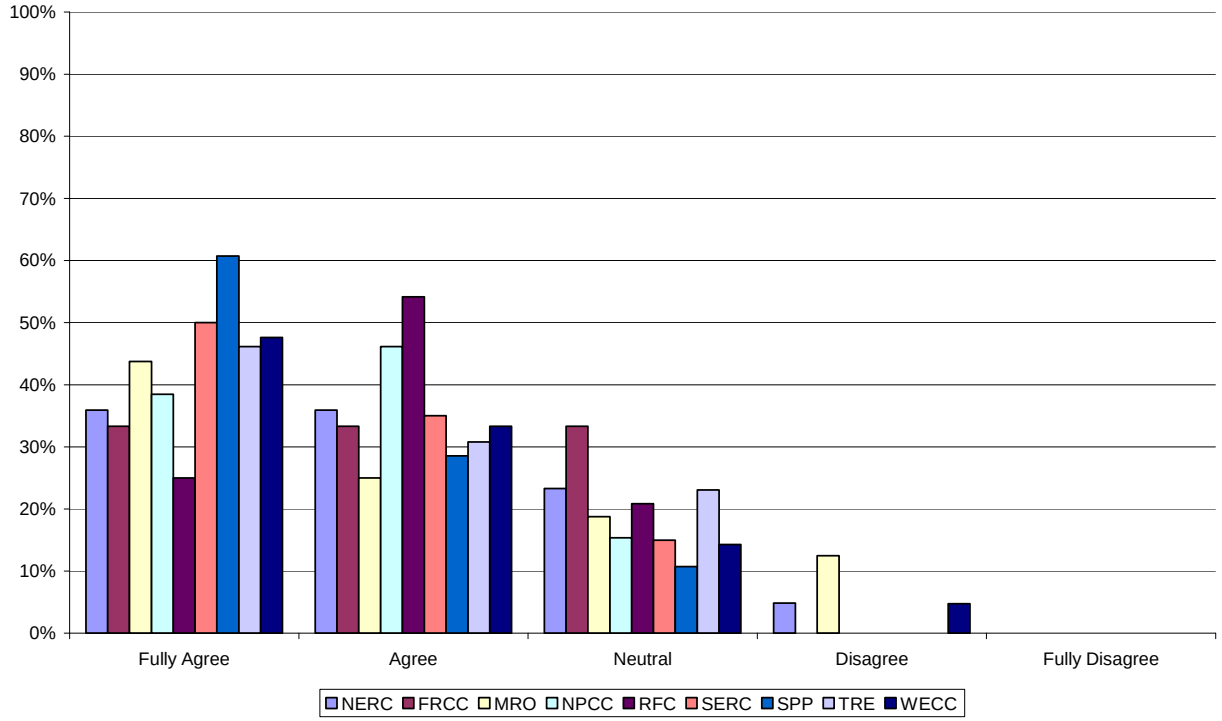
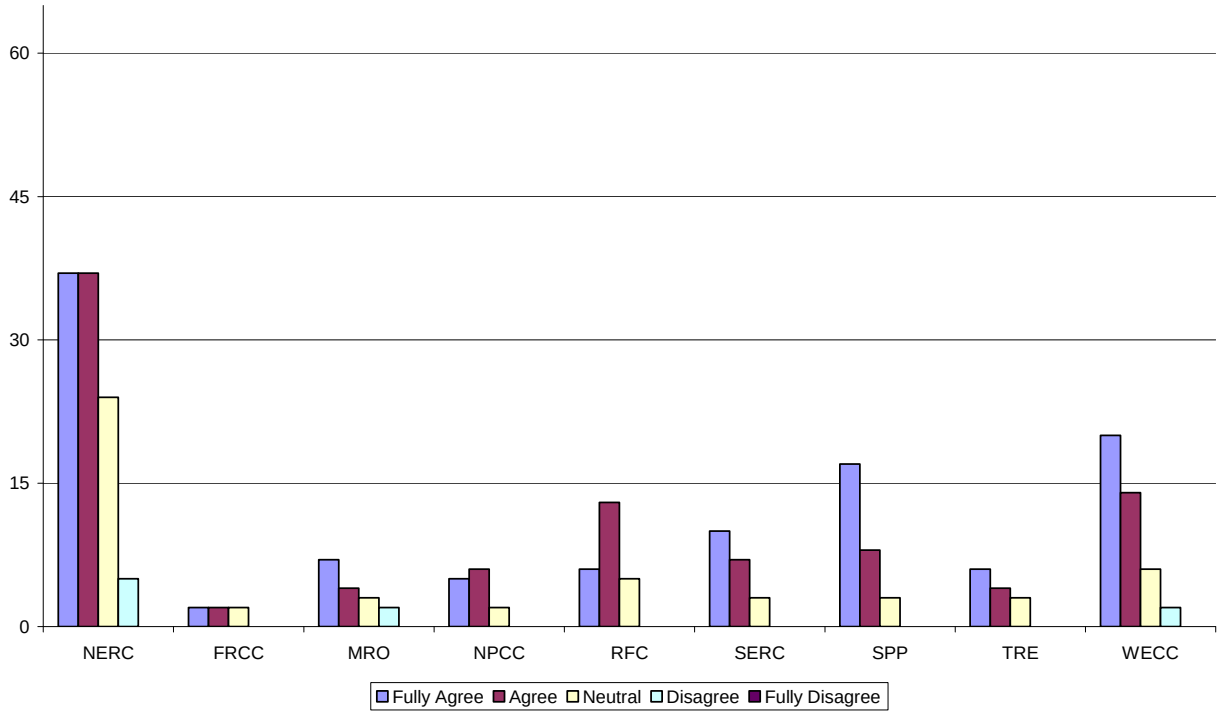
Question 51



ERO Survey - Stakeholder Communication and Public Relations
Question 51



	Comments and recommendations:
1	1. Both NERC and FRCC make concerted efforts to keep stakeholders informed through stakeholder meetings, newsletters, and e-mail announcements.
2	Again, information is geared towards tradition vertically integrated operations and not the LSE/DP/PSE functions
3	Both NERC and WECC have websites and e-mail distribution lists for timely and effective communications. Content should be improved to provide best practice documentation for meeting the standards.
4	IMEA would like to see more emphasis on Workshops to facilitate compliance (as recently implemented by RFC), as opposed to Seminars summarizing compliance monitoring and enforcement procedures.
5	In many cases, discovering the status of the broad range of issues being handled by NERC requires an in-person presence at various meetings and conferences. Exelon observes that many webinars are scheduled only once and often with short notice. This is not conducive to providing the industry stakeholders with opportunities to ask and receive answers for questions. Additionally, the communications advertising upcoming webinars should clearly list the topics that will be discussed. For example, the announcement for a recent NERC Alerts webinar did not state that major process changes would be discussed during the session. Exelon points out that the RFC Compliance Enforcement Action report is a best practice and represents a good improvement. In addition, RFC does a nice job of publicizing and disseminating information on the standards development process projects and ballots.
6	In many cases, discovering the status of the broad range of issues being handled by NERC requires an in-person presence at various meetings and conferences. I wonder whether some structure can be designed to provide stakeholders with a clearer 'landscape,' for example, a monthly report on the key issues being addressed by the OC, PC, Standards, and CIP committees, including sections to cover 'deadlines,' 'next steps,' 'key outcomes,' and 'emerging issues.' Possibly, the secretaries of these committees could post in a common location this kind of information, including contact information to allow stakeholders to find out more on a specific issue.
7	In many cases, discovering the status of the broad range of issues being handled by NERC requires an in-person presence at various meetings and conferences. I wonder whether some structure can be designed to provide stakeholders with a clearer 'landscape,' for example, a monthly report on the key issues being addressed by the OC, PC, Standards, and CIP committees, including sections to cover 'deadlines,' 'next steps,' 'key outcomes,' and 'emerging issues.' Possibly, the secretaries of these committees could post in a common location this kind of information, including contact information to allow stakeholders to find out more on a specific issue.
8	In many cases, discovering the status of the broad range of issues being handled by NERC requires an in-person presence at various meetings and conferences. Possibly some structure can be designed to provide stakeholders with a clearer 'landscape,' for example, a monthly report on the key issues being addressed by the OC, PC, Standards, and CIP committees, including sections to cover 'deadlines,' 'next steps,' 'key outcomes,' and 'emerging issues. One option is that the secretaries of these committees could post in a common location this kind of information, including contact information to allow stakeholders to find out more on a specific issue. SERC website has been a reference for SERC committees, supplements, and meeting information.
9	It often seems as if there is too much communication. It is hard to keep up with it all.
10	Meetings do not typically translate into actionable items.
11	NERC conferences and other communications need to be more frequent.
12	NERC could establish an outreach program to better manage stakeholder and industry communications.
13	NERC could establish an outreach program to better manage stakeholder and industry communications.
14	NERC could use additional communications with conferences and WebEx events. Major large scale events such as the Florida incident are examples where information and WebEx sessions are deemed appropriate - both from an initial triage approach as well as mid and final report and root cause reporting to the industry.
15	NERC workshops and newsletters

	Comments and recommendations:
16	SPP Compliance Workshops are a huge plus.
17	SPP is a party to the IRC Standards Review Comments, please refer to that submittal for our response to this question.
18	SPP RE and SPP RC very good at providng workshops and assistance. NERC News and Standard Announcements are helpful.
19	The MRO and NERC provides regular newsletters on Standards and Compliance. The MRO also host periodic workshops that provide useful information to participants on compliance. MRO staff are very responsive to e-mails and telephone calls.
20	The SPP RE training provided has been a tremendous help in answering questions and providing necessary information to perform the correct job related to reliability.
21	The Standards group does a good job with their annual workshops. The Compliance group needs to do a better job with outreach. They need should pair with the Standards group during the annual workshop because at the companies many of the same people are involved with both standards and compliance and with the new mandatory environment there are many questions with regard to compliance that are not getting answered.
22	Users must be proactive to stay current with NERC activities. SPP members receive notices for SPP activities.
23	WECC's quarterly meetings clearly demonstrate a dedication to communication. The earlier "Open Mic" calls, despite the limited call-in capacity, indicated WECC's appreciation of the need for information. The WECC newsletter also offers good information both on WECC and NERC subjects. Unfortunately the quarterly meetings have issues. The process to register such a large and diverse group meant that the meetings were too repetitive for 2007 and most of 2008. Repetition was caused by new participants asking the same questions in each new quarterly CUG. WECC's reluctance to document previous meetings in a FAQ format (for example), was a major reason for the repetition. There were no reference materials to use for new Registered Entities. Only recently have technical issues been addressed but useful, definitive information is still lacking. WECC presentations should be improved to provide guidance on technical compliance applications. Given the volume of activities (tracking new/revised emerging standards, following interpretations of existing standards, implementing current standards, training and retraining), useful and timely guidance is needed to keep all of these activities in synch.
24	While NERC consistently provides high quality information, it would be helpful if functional applicability was more transparent in its announcements regarding standards development activities. WECC regularly communicates with registered entities. Newsletters and announcements are not always timely and often contain factual errors. Compliance related communications are often constructed in such a way that their intent and message are unclear.

52. Provides effective outreach to all jurisdictional stakeholders, including smaller entities with limited ability to travel to meetings and conferences.

	NA – Not applicable or have no opinion	1 – Fully agree	2	3 – Neutral	4	5 – Fully Disagree	Response Count
NERC	18.2% (20)	19.1% (21)	22.7% (25)	**23.6% (26)**	14.5% (16)	1.8% (2)	110
FRCC	**86.5% (32)**	5.4% (2)	5.4% (2)	2.7% (1)	0.0% (0)	0.0% (0)	37
MRO	**74.4% (32)**	7.0% (3)	7.0% (3)	9.3% (4)	2.3% (1)	0.0% (0)	43
NPCC	**75.0% (30)**	12.5% (5)	5.0% (2)	7.5% (3)	0.0% (0)	0.0% (0)	40
RFC	**63.8% (30)**	12.8% (6)	12.8% (6)	8.5% (4)	2.1% (1)	0.0% (0)	47
SERC	**66.7% (30)**	15.6% (7)	11.1% (5)	6.7% (3)	0.0% (0)	0.0% (0)	45
SPP	**53.1% (26)**	20.4% (10)	12.2% (6)	4.1% (2)	10.2% (5)	0.0% (0)	49
TRE	**76.3% (29)**	13.2% (5)	5.3% (2)	2.6% (1)	2.6% (1)	0.0% (0)	38
WECC	**35.9% (23)**	18.8% (12)	18.8% (12)	14.1% (9)	12.5% (8)	0.0% (0)	64
					Comments and recommendations:		27
						answered question	**119**
						skipped question	**23**

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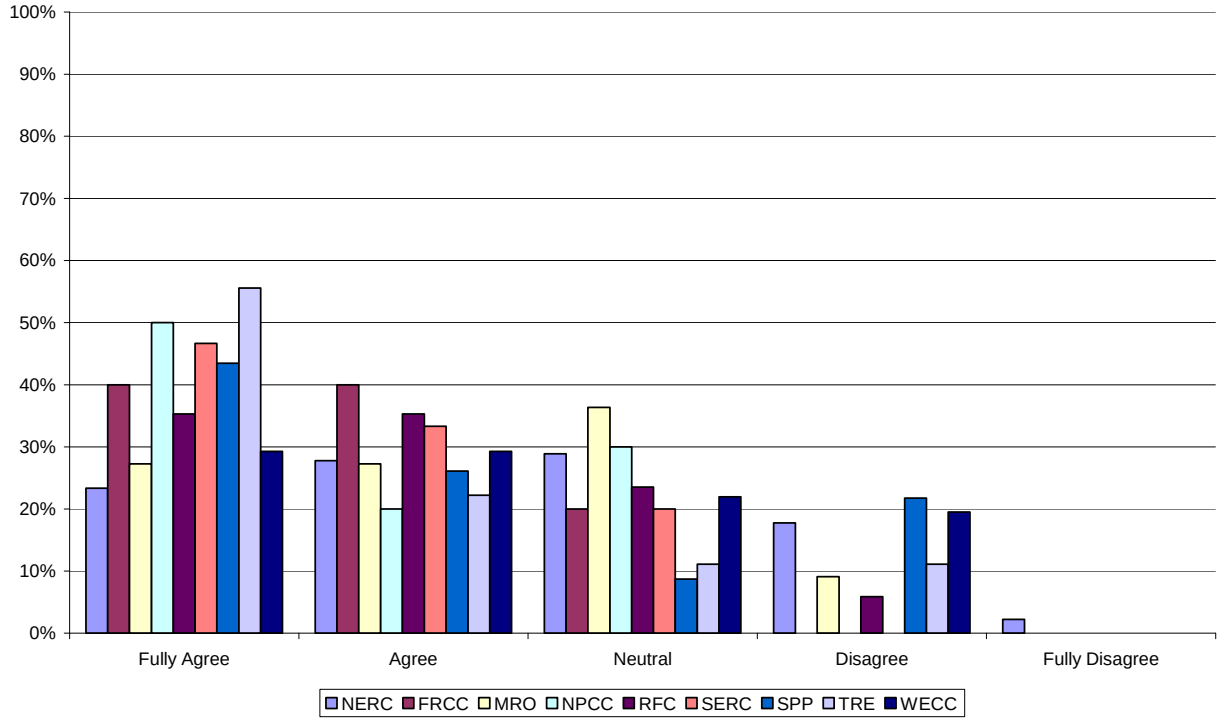
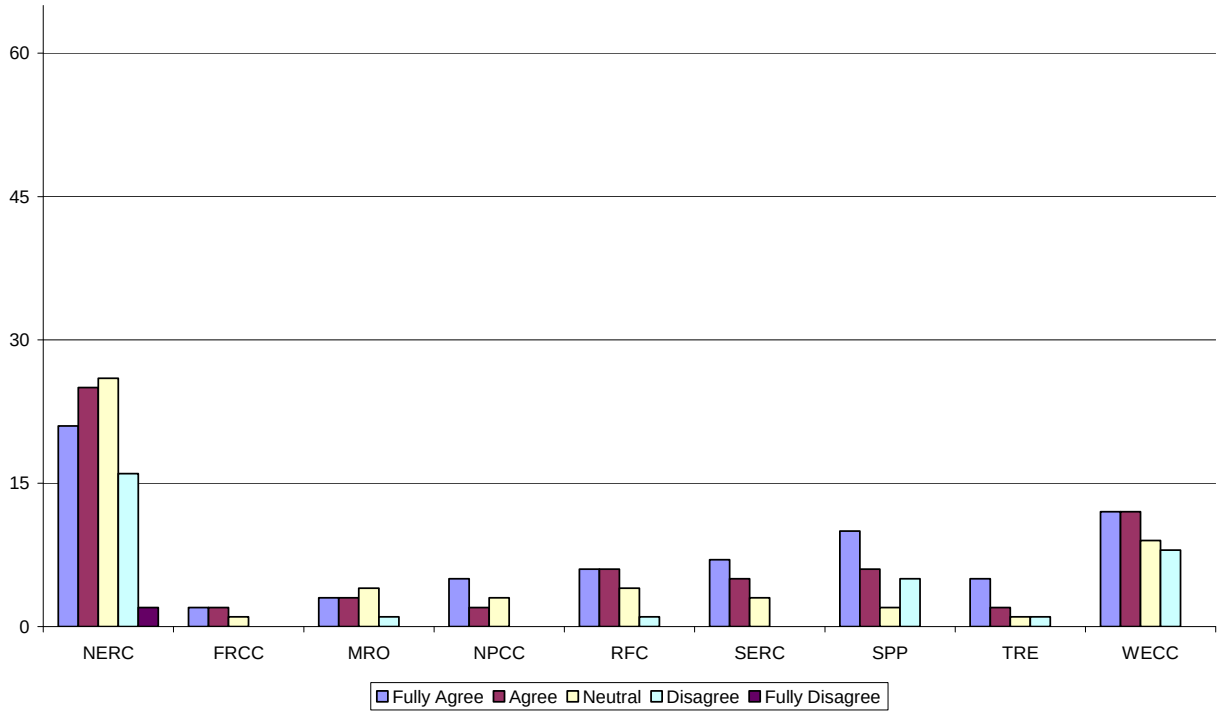
Question 52



ERO Survey - Stakeholder Communication and Public Relations
Question 52



	Comments and recommendations:
1	(1) Taud Olsen is an excellent addition to WECC's Compliance team. (2) There are increasing concerns regarding expense of travel to CUGs/CIPUGs and the possibility of web-based meetings needs to be reconsidered. (3) Not aware of NERC's outreach efforts.
2	1. The amount of time, effort, and travel needed to keep up with reliability standards development, procedural elements and other parts of the NERC process are significant and may be prohibitive for smaller entities, particularly for participation in standards development.
3	1. Webinars are nice.
4	Continue to expand use of webinars. Not sure about outreach to smaller entities.
5	Does not apply.
6	Getting better on conference calls and webcasts, but can be improved.
7	IMEA would like to see more emphasis on Workshops to facilitate compliance (as recently implemented by RFC), as opposed to Seminars summarizing compliance monitoring and enforcement procedures.
8	Internet and Telephonic access to SPP sessions is still needed to enhance participation in the process. Others have provided the modes necessary for participation.
9	Meetings should be on WEBcast
10	NERC appears to communicate and listen to FERC more than the stakeholders.
11	NERC could establish an outreach program to better manage stakeholder and industry communications. The outreach program should extend to all entities big or small – this would help smaller entities including many municipal co-ops to better communicate with the industry through NERC.
12	NERC does not have an effective outreach to all industry participants. NERC should establish an outreach program to better manage stakeholder and industry communications. The outreach program should extend to all entities big or small – this would help smaller entities including many municipal co-ops to better communicate with the industry through NERC.
13	NERC effectively uses conference calls and webinars to broadly communicate with its constituents. WECC relies too heavily on live stakeholder meetings that don't include a teleconference option. WECC often conveys compliance related information at live meetings that is not otherwise available to smaller registered entities without the necessary resources to attend.
14	NERC offers some webinar based outreach such as the recent Alert training. However, WECC has not used electronic tools except for the conference calls. The WECC conference calls were limited to 125 callers, with over 400 entities in the region, meaning the majority of entities were unable to even call in. Despite repeated requests, WECC has declined to record the conference calls so entities could listen at a later time. WECC recently implemented recording but a lot of time has been wasted in multiple repetitions of the same question/answer sessions because records were not kept of earlier sessions. This has added immensely to the frustration to those entities involved from the beginning and delayed the entire process. Travel is a big problem. It is very expensive and time consuming which results in limited attendance and compounds the cost issues for entities trying to comply.
15	NERC-NERC is improving in this area. The use of conference calls is a great tool and seems to be utilized more by SDTs. RFC- RFC needs to improve in this area. The use of conference calls would benefit RFC in this area and meeting times should be posted so that observers know when the SDT is meeting.
16	No Comment
17	Recent developments by WECC are very positive in this area. Some experimentation with webcasts of workshops and conferences should be attempted to supplement the posting of information at the completion of an event.

	Comments and recommendations:
18	Small entities continue to struggle with lack of access to the issues at NERC and WECC. There appears to be little possibility of effectively closing this gap. NERC/WECC websites are a valuable assistance, but for the small entities who are relative new-comers to the BES world, this is of little consolation. This illustrates in part the consequence of overreaching the applicability of the NERC Standards to these small entities, who really have no possible influence on the overall BES reliability, but because of their service voltage being above an arbitrary kV level, they are swept into a world of NERC Standards that is overwhelming. The labor burden and financial impact to the small entities must be staggering for them, and one must ask, is this expense producing any real benefit? WECC has indeed begun a monthly "open-mic" conference call forum that is a no-cost approach to communicating outreach to all stakeholders. Taud Olson has implemented positive changes in this area and improved this initiative.
19	SPP has been available to CWL to address our needs in a number of ways.
20	SPP is a party to the IRC Standards Review Comments, please refer to that submittal for our response to this question.
21	The budgetary process of small entities vary and it isn't known early enough about the next year training opportunities so a guess is made as to the financial needs. If longer planning could take place at the SPP or NERC, better estimates could take place as to the financial needs. Providing training at various locations increases the ability of smaller entities to attend more events.
22	The outreach program of the Regional Entities are effective.
23	Travel may be an issue for smaller entities - WECC outreach typically includes traveling to four separate locations in a given year. Though NERC's recent outreach conferences and webinars have been effective, they are needed on many additional topics and on a much more frequent basis.
24	WECC has improved immensely this year on their communications to Registered Entities and Stakeholders.
25	WECC has improved on this area somewhat over the past four months.
26	WECC needs to provide a video and/or audio feed to its CUG meetings. These meetings are expensive to go to and take up a lot of valuable time travelling. Also, the WECC needs to have these meetings at locations that are close to airports that are generally easy to get to.
27	Yes, teleconference is usually available which is convenient. WECC: Most of the information Tacoma Power obtains from WECC comes in meetings. The web portal/compliance home pages are being populated more thoroughly and becoming more useful. This will raise WECC's score from Tacoma Power's perspective over the coming year.

53. Comments and recommendations:	
	Response Count
	11
answered question	11
skipped question	131

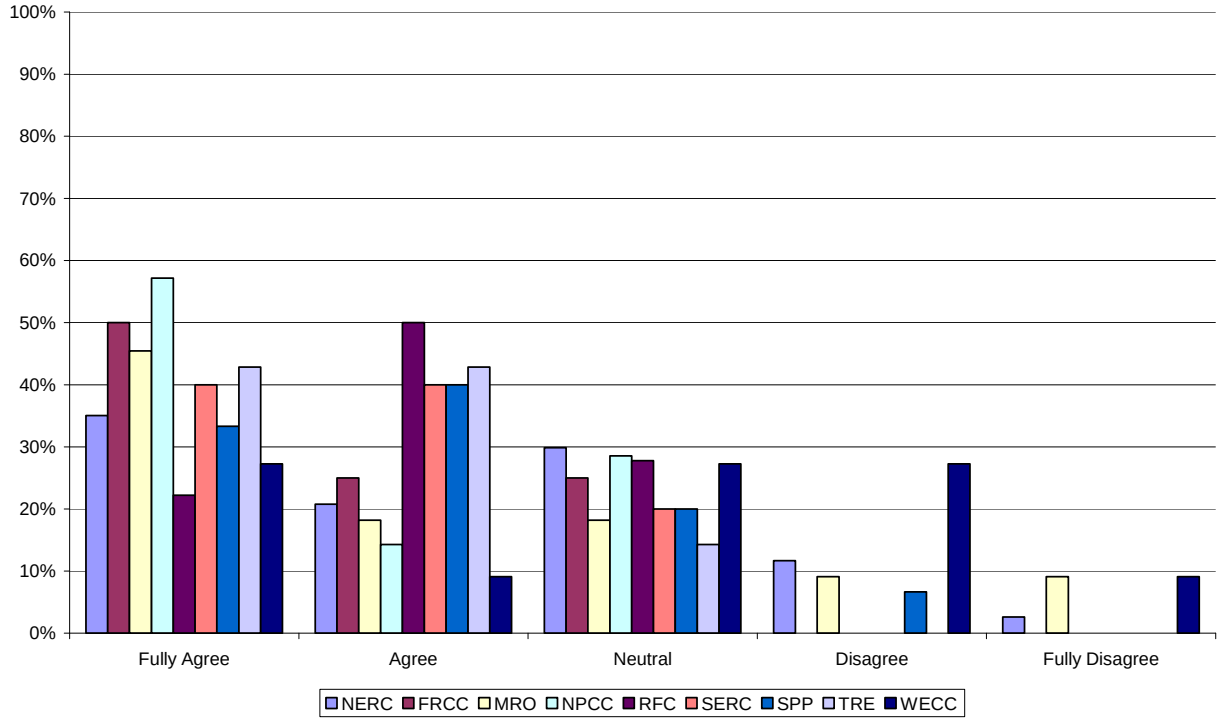
	Comments and recommendations:
1	More web-based and electronic offerings should be made with unlimited access. This would ensure that multiple people from each Registered Entity could participate.
2	NERC should conduct a survey similar to this one, but allow the responders to remain anonymous. It is very likely that NERC would receive different answers in such a survey.
3	NERC should not involve itself nor advocate its own position in policy matters that go beyond its direct role in developing and enforcing compliance with standards needed for reliable operations of the bulk power system. When practical and appropriate, NERC should seek the guidance of the NERC Member Representatives Committee (MRC) before making public statements on policy matters.
4	none
5	None
6	None
7	Please see previous comments and suggestions.
8	Tacoma Power has not attended a NERC meeting in the past two years due to travel costs. Maybe NERC could rotate meetings around the country to reduce the relative expenses for all area's utilities. NERC issues a great deal of information via email. This is both good and bad. The information is at our fingertips (good). Information management verges on overload for a small entity (bad); and large documents don't get read. Anything that would streamline the system to reduce the volume would help.
9	The "WebeX" conferences are great.
10	There are no comments and/or recommendations at this time.
11	Webcasts have been helpful.

Finance and Controls

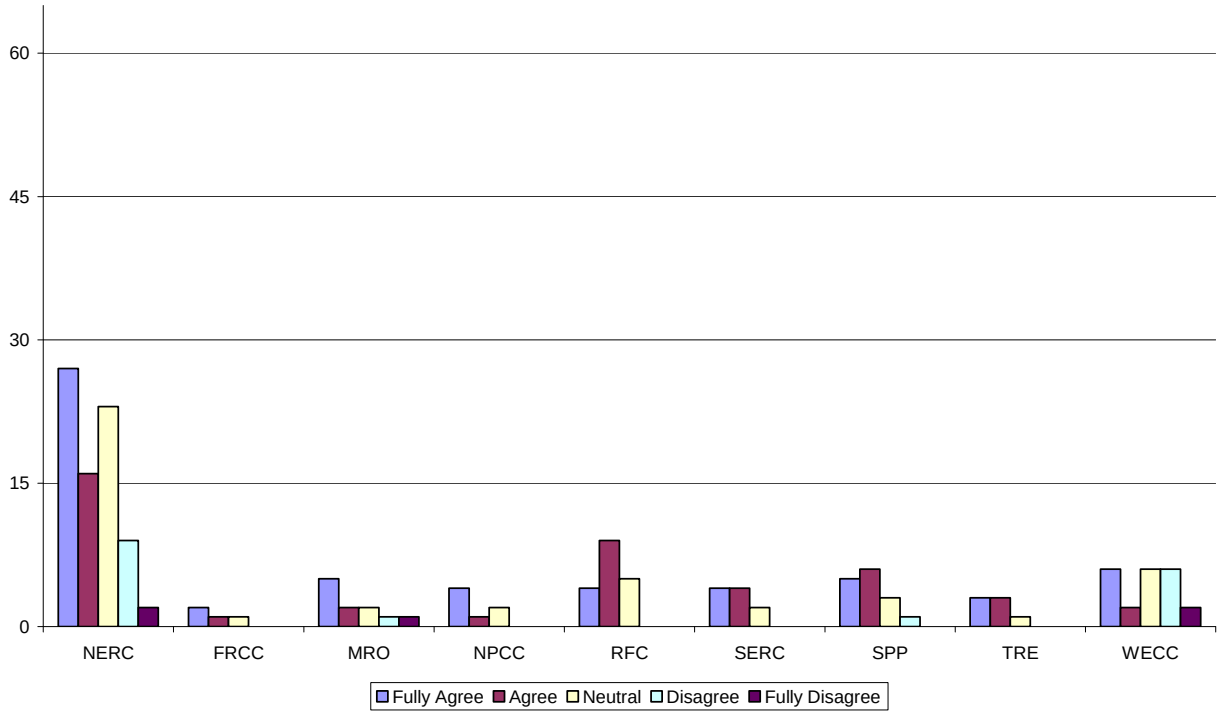
54. Provides reasonable opportunity for members and other stakeholders to provide input in the annual budgeting process and takes member/stakeholder input into account in developing final budgets for submission to FERC.

	NA – Not applicable or have no opinion	1 – Fully agree	2	3 – Neutral	4	5 – Fully Disagree	Response Count
NERC	**28.7% (31)**	25.0% (27)	14.8% (16)	21.3% (23)	8.3% (9)	1.9% (2)	108
FRCC	**89.2% (33)**	5.4% (2)	2.7% (1)	2.7% (1)	0.0% (0)	0.0% (0)	37
MRO	**75.0% (33)**	11.4% (5)	4.5% (2)	4.5% (2)	2.3% (1)	2.3% (1)	44
NPCC	**81.6% (31)**	10.5% (4)	2.6% (1)	5.3% (2)	0.0% (0)	0.0% (0)	38
RFC	**61.7% (29)**	8.5% (4)	19.1% (9)	10.6% (5)	0.0% (0)	0.0% (0)	47
SERC	**76.7% (33)**	9.3% (4)	9.3% (4)	4.7% (2)	0.0% (0)	0.0% (0)	43
SPP	**69.4% (34)**	10.2% (5)	12.2% (6)	6.1% (3)	2.0% (1)	0.0% (0)	49
TRE	**81.1% (30)**	8.1% (3)	8.1% (3)	2.7% (1)	0.0% (0)	0.0% (0)	37
WECC	**63.9% (39)**	9.8% (6)	3.3% (2)	9.8% (6)	9.8% (6)	3.3% (2)	61
					Comments and recommendations:		17
						answered question	**114**
						skipped question	**28**

ERO Survey - Finance and Controls
Question 54



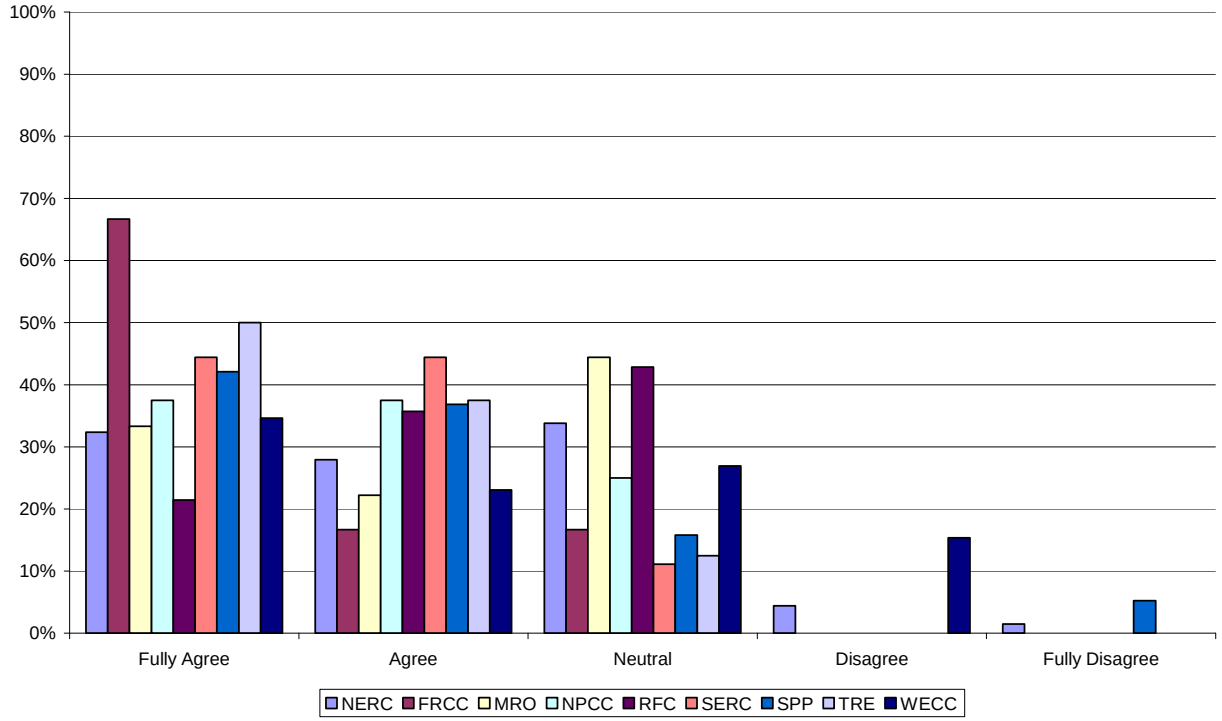
ERO Survey - Finance and Controls
Question 54



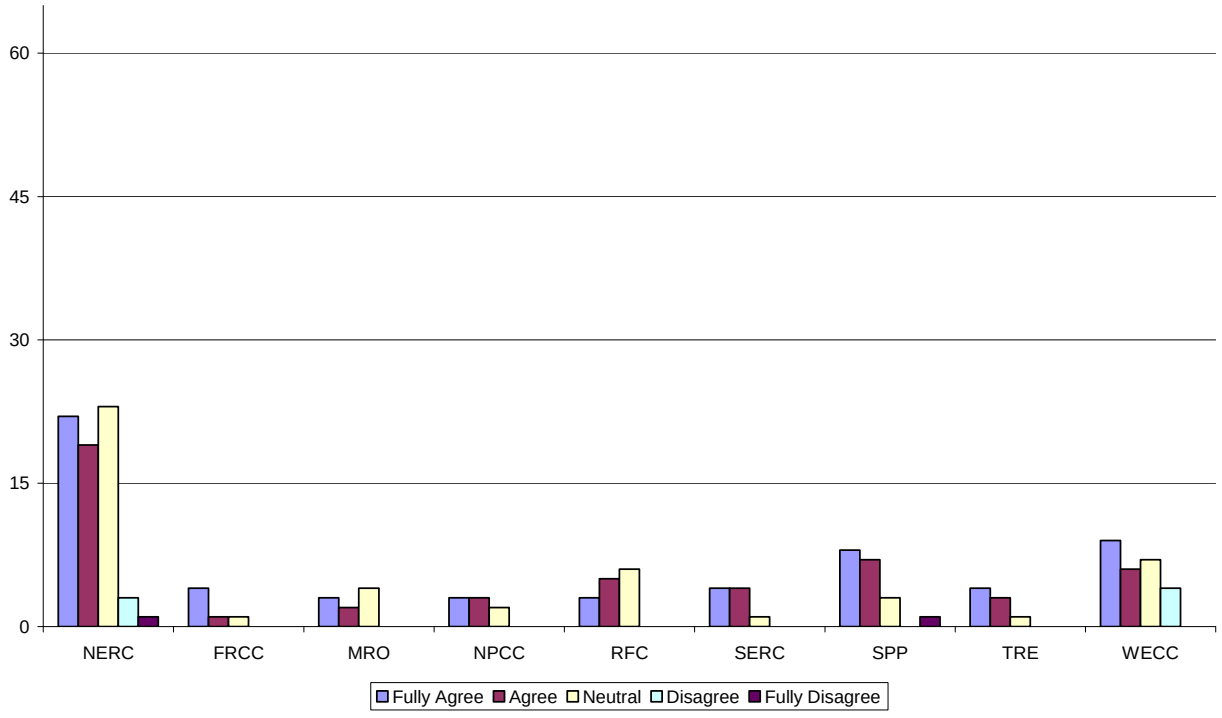
	Comments and recommendations:
1	Although stakeholders have input to budgeting, stakeholder concerns and recommendations do not appear to be considered.
2	Compliance issues are getting more attention. Volume of information issue. When a small entity must prioritize which NERC or WECC messages to read, some things are bound to fall through the cracks.
3	Costs of reliability standards compliance and enforcement activities are presented as a fait accompli. Registered entities, especially smaller organizations, have little or no opportunity to provide input.
4	Exelon feels that NERC does provide opportunity for members and other stakeholders to provide input into the annual budgeting process.
5	I am not sure how much influence the copmanies have to determing the budget.
6	IMEA is not able to adequately comment due to limited resources available to monitor such plans. IMEA supports comments submitted by the Transmission Access Policy Study Group (TAPS) and the American Public Power Association (APPA).
7	It appears that the opportunity to provide input and receive due consideration on budgetary matters is confined to the Finance and Audit Committee meetings of the WECC Board. At the Standing Committee level, there is no opportunity for input to the budget process for the WECC Region. The annual budget is presented to the entities in Standing Committee Meetings in its final form.
8	NERC NERC provides reasonable opportunity for members and other stakeholders to provide input to the annual budgeting process in a fair and transparent manner. However, NERC should be prepared to stand behind its submission if/when questioned by FERC and reinforce the philosophy of drawing from contingency or realigning resources to meet changing situations and priorities. If not it brings into question the credibility of the process. NPCC NPCC provides reasonable opportunity for members and other stakeholders to provide input in the annual budgeting process and takes member/stakeholder input into account in developing final budgets for submission to NERC and FERC.
9	NERC - Provide information in a timely manner to allow all to participate.
10	NERC does an outstanding job involving stakeholders in their annual budget process. The process for developing the WECC budget would be improved if it followed the NERC budget process.
11	NERC does have an open budget process for gathering stakeholder input. NERC should limit changes to their budget once filed with FERC for approval.
12	NERC provides reasonable opportunities for stakeholders input. SERC provides reasonable opportunities for stakeholders input.
13	NERC provides reasonable opportunity for members and other stakeholders to provide input to the annual budgeting process in a fair and transparent manner. However, NERC should be prepared to stand behind its submission if/when questioned by FERC and reinforce the philosophy of drawing from contingency or realigning resources to meet changing situations and priorities. If not it brings into question the credibility of the process.
14	No Comment
15	SPP is a party to the IRC Standards Review Comments, please refer to that submittal for our response to this question.
16	the NERC budget process is a shining example of how a member organization should conduct itself. The process is open, transparent, and ample time is provided.
17	While WECC provides for review of its budget at the Board level, it is typically too late in the process for WECC membership as a whole to effectuate any change if needed prior to filing with FERC. Expanding the process to allow for member review prior to Board level review of the budget would be helpful. Additionally, more transparency around cost increases and how they add value or contribute to risk management would also be helpful. There should also be increased clarity on what organizations have what compliance enforcement and what the funding provides relative to audits and outage investigations. Despite the establishment of final budgets there seems to be shifts in the money spent and organization doing the work that is difficult to foresee at the time of budget approval.

55. Operating costs are fairly allocated to bulk power system users.							
	NA – Not applicable or have no opinion	1 – Fully agree	2	3 – Neutral	4	5 – Fully Disagree	Response Count
NERC	**35.8% (38)**	20.8% (22)	17.9% (19)	21.7% (23)	2.8% (3)	0.9% (1)	106
FRCC	**83.8% (31)**	10.8% (4)	2.7% (1)	2.7% (1)	0.0% (0)	0.0% (0)	37
MRO	**79.1% (34)**	7.0% (3)	4.7% (2)	9.3% (4)	0.0% (0)	0.0% (0)	43
NPCC	**78.9% (30)**	7.9% (3)	7.9% (3)	5.3% (2)	0.0% (0)	0.0% (0)	38
RFC	**70.2% (33)**	6.4% (3)	10.6% (5)	12.8% (6)	0.0% (0)	0.0% (0)	47
SERC	**78.6% (33)**	9.5% (4)	9.5% (4)	2.4% (1)	0.0% (0)	0.0% (0)	42
SPP	**60.4% (29)**	16.7% (8)	14.6% (7)	6.3% (3)	0.0% (0)	2.1% (1)	48
TRE	**78.4% (29)**	10.8% (4)	8.1% (3)	2.7% (1)	0.0% (0)	0.0% (0)	37
WECC	**58.1% (36)**	14.5% (9)	9.7% (6)	11.3% (7)	6.5% (4)	0.0% (0)	62
					Comments and recommendations:		15
						answered question	**116**
						skipped question	**26**

ERO Survey - Finance and Controls
Question 55



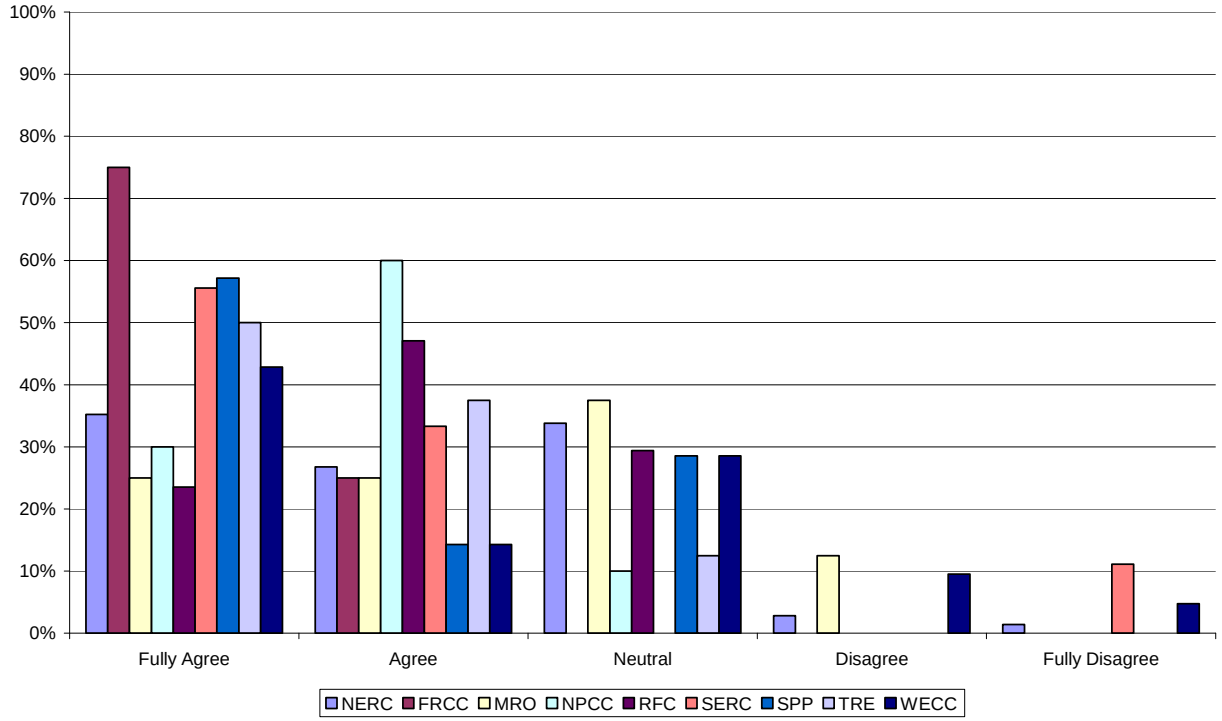
ERO Survey - Finance and Controls
Question 55



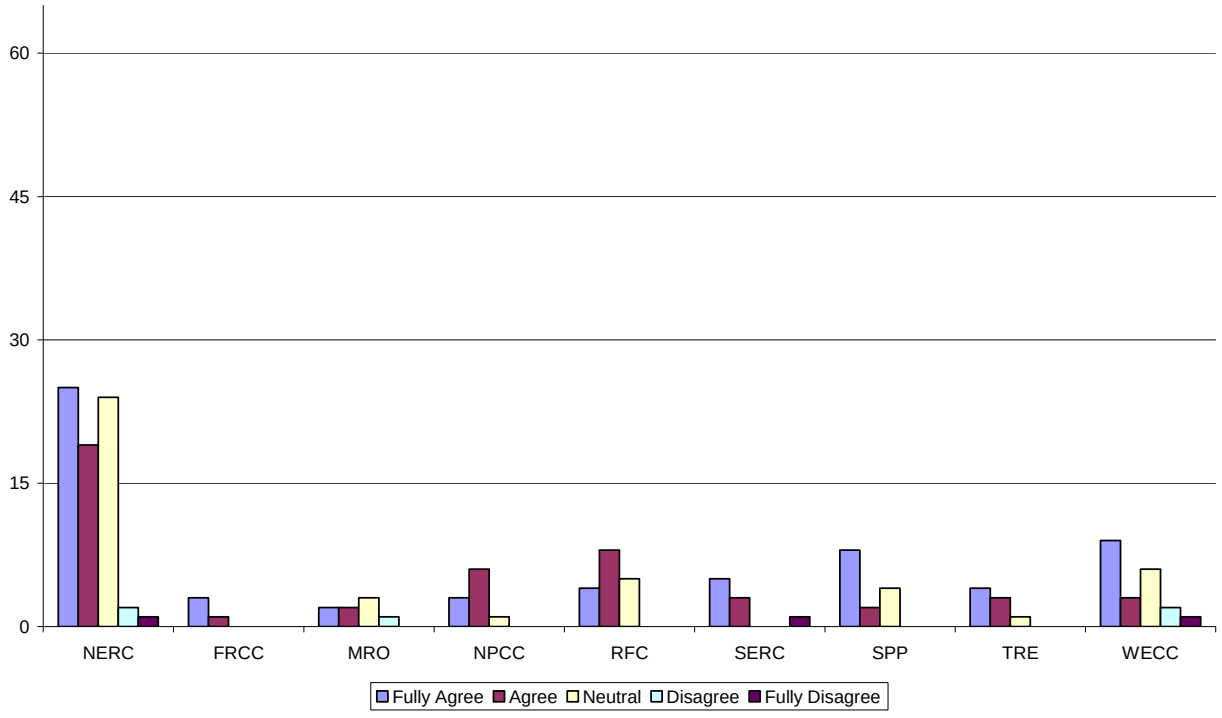
	Comments and recommendations:
1	Consider an allocation based on Net generation Net energy for load Transmission kV-miles. Therefore, IPPs and transmission-only companies as well as loads would help pay for NERC.
2	However FERC fees are not fairly alocated to bulk power system users, as RTO's pay much higher FERC rate than non RTO members.
3	If the LSE/DP cost is related to customers/meters served then the cost is equal. I'm not certain on the actual method, but consideration should be given to ratio the cost so larger entities pay a higher cost versus a smaller entity.
4	IMEA currently receives quarterly NERC/SERC Assessments based on LSE Net-Energy-for-Load.
5	NERC NERC's Bylaws require that the funding mechanism used to recover its net annual budget requirement (i.e., net of fees and other revenues received by NERC from users and purchasers of NERC products and services, and net of prior period funding surplus or deficiency) shall consist of such assessments as determined by the [NERC Board] that result in an equitable allocation of the Corporation's funding requirement among end users of the North American electric utility system as established in the Corporation's Rules of Procedure. However, we as Canadian entities are concerned regarding paying for programs which are driven exclusively by FERC. NPCC Allocation of costs including credit allocations to Ontario and Quebec for internally managed reliability standards compliance programs is fair and equitable. However, we as Canadian entities are concerned regarding paying for programs which are driven exclusively by FERC.
6	NERC revenue is not generated from ALL users; for example, Generators.
7	NERC should directly question each LSE for load information. Balancing Authorities do not have sufficient information for all loads.
8	NERC's Bylaws require that the funding mechanism used to recover its net annual budget requirement (i.e., net of fees and other revenues received by NERC from users and purchasers of NERC products and services, and net of prior period funding surplus or deficiency) shall consist of such assessments as determined by the [NERC Board] that result in an equitable allocation of the Corporation's funding requirement among end users of the North American electric utility system as established in the Corporation's Rules of Procedure. Canadian entities are rightly concerned regarding paying for programs which are driven exclusively by FERC. US entities then may end up paying greater costs.
9	No Comment
10	None
11	Operating costs are allocated according to EPA of 2005.
12	SPP concurs with the IRC Standards Review Committee's response related to the funding mechanism used to recover its net annual budget requirement. However, we emphasize that costs to meet reliability objectives and to participate in NERC audits are directly borne by the subject registered entity. SPP is committed to being responsive to NERC audits and has provided necessary resources to complete NERC audits. Audits are man-hour intensive and have real costs to SPP as staff must put in extra hours to provide audit data and responses in addition to their everyday duties. We therefore are strong proponents of an efficient and non-duplicative audit process. Duplicating or revisiting past audits unfairly burdens a registered entity and causes increases on the NERC budget.
13	the Canadian members unwillingness to pay for FERC mandated costs in some cases, while understandable pose a threat for the future.
14	We assume the question was asking whether costs are fairly alocated to LSEs? IF so , the formula of net energy to load is fair. Stakeholders are not engaged fairly and proportionately in NERC and RE activities; yet all expect an equal voice in the decision making processes. NERC should consider developing a metric to track stakeholder participation and to incent those that have not participated, to participate .
15	We fully support allocation of WECC reliability costs to all load in the Western Interconnection.

56. Provides acceptable levels of financial information in its business plans and financial reporting.							
	NA – Not applicable or have no opinion	1 – Fully agree	2	3 – Neutral	4	5 – Fully Disagree	Response Count
NERC	**33.6% (36)**	23.4% (25)	17.8% (19)	22.4% (24)	1.9% (2)	0.9% (1)	107
FRCC	**88.9% (32)**	8.3% (3)	2.8% (1)	0.0% (0)	0.0% (0)	0.0% (0)	36
MRO	**81.0% (34)**	4.8% (2)	4.8% (2)	7.1% (3)	2.4% (1)	0.0% (0)	42
NPCC	**73.7% (28)**	7.9% (3)	15.8% (6)	2.6% (1)	0.0% (0)	0.0% (0)	38
RFC	**63.0% (29)**	8.7% (4)	17.4% (8)	10.9% (5)	0.0% (0)	0.0% (0)	46
SERC	**78.0% (32)**	12.2% (5)	7.3% (3)	0.0% (0)	0.0% (0)	2.4% (1)	41
SPP	**70.2% (33)**	17.0% (8)	4.3% (2)	8.5% (4)	0.0% (0)	0.0% (0)	47
TRE	**77.8% (28)**	11.1% (4)	8.3% (3)	2.8% (1)	0.0% (0)	0.0% (0)	36
WECC	**65.0% (39)**	15.0% (9)	5.0% (3)	10.0% (6)	3.3% (2)	1.7% (1)	60
					Comments and recommendations:		11
						answered question	**114**
						skipped question	**28**

ERO Survey - Finance and Controls
Question 56



ERO Survey - Finance and Controls
Question 56



	Comments and recommendations:
1	IMEA is not able to adequately comment due to limited resources available to monitor such plans. IMEA supports comments submitted by the Transmission Access Policy Study Group (TAPS) and the American Public Power Association (APPA).
2	It is not easy to judge the efficiency of the combined budgets. However, it seems like there should be opportunity to reduce costs, enhance efficiency, and improve reliability.
3	It is still early in the process and we need to see how things develop.
4	Money is always tricky
5	More transparency regarding costs and associated activities would be helpful. For example, additional information regarding headcount increases and how the change ties back to value for members or risk management should be provided.
6	NERC The NERC Business Plan and Budget provides an appropriate level of financial information. It is helpful and an appropriate goal to align the Business Plan and Budget templates used by NERC and the Regional Entities. Useful additions would be using budget scenarios such that industry could understand the risks of budgets which show smaller cost increases (or even decreases) from previous years. NERC should also develop 3 year business plans so that industry can get insight into future programs and cost and resource changes in future years. NPCC The NPCC business plan and strategy documents provide an appropriate level of information.
7	NERC needs to present budgets in summary form inclusive of graphical representations in addition to all the details. The summary would provide the readers, particularly the regulators and the CEOs of entities, with a clear picture of where the NERC /Region dollar is going to be invested.
8	Please see our comment to question 1 in section 12.
9	SPP is a party to the IRC Standards Review Comments, please refer to that submittal for our response to this question.
10	The NERC Business Plan and Budget provides an appropriate level of financial information. It is helpful and an appropriate goal to align the Business Plan and Budget templates used by NERC and the Regional Entities.
11	Would like more detailed information on where the monies from penalties will land.

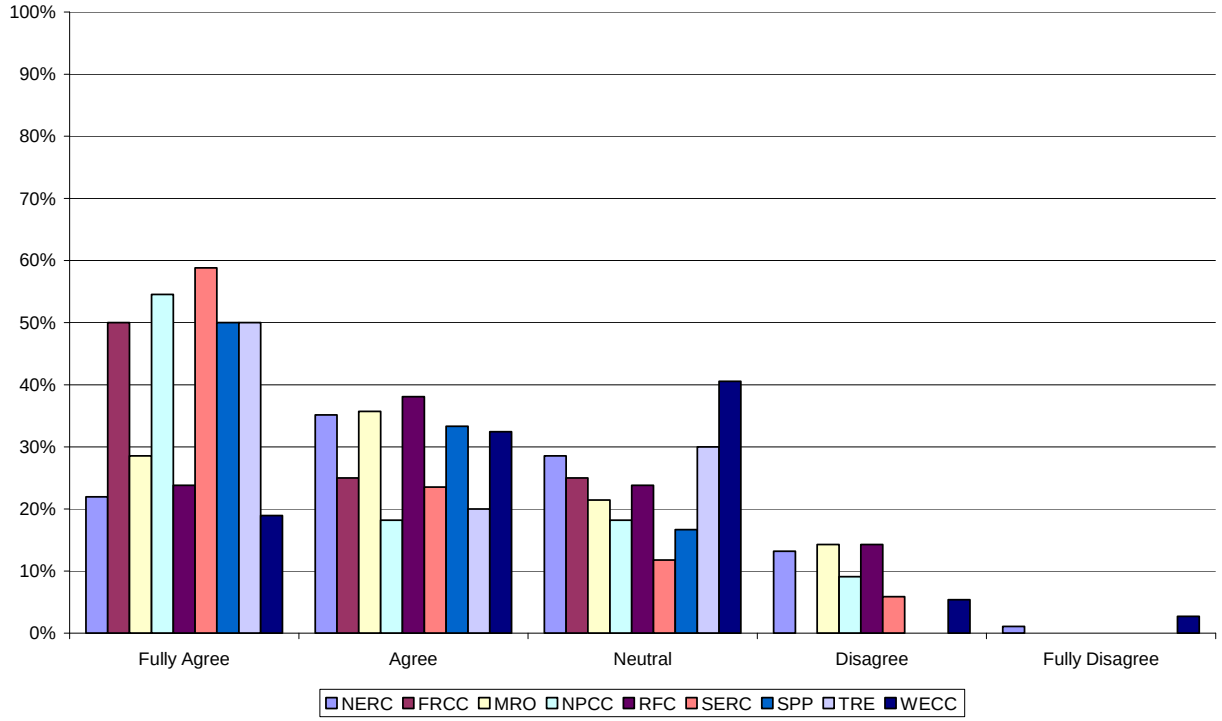
57. Comments and recommendations:	
	Response Count
	11
answered question	11
skipped question	131

	Comments and recommendations:
1	I have no experience with NERC in this area.
2	It is important that all entities be on eaqual footing.
3	NERC should conduct a survey similar to this one, but allow the responders to remain anonymous. It is very likely that NERC would receive different answers in such a survey.
4	none
5	None
6	None
7	None
8	Please see previous comments and recommendations.
9	Recommendation 1) NERC should establish 1 to 5 year business plans so that its direction is clear, objectives can be pursued, and assessment of its performance can be more targeted and objective in the future.
10	The ongoing escalating costs of NERC and the WECC are a concern. Containing the scope of activities to their mandates without expanding into other areas should be considered in future business planning and budgeting.
11	There are no comments and/or recommendations at this time.

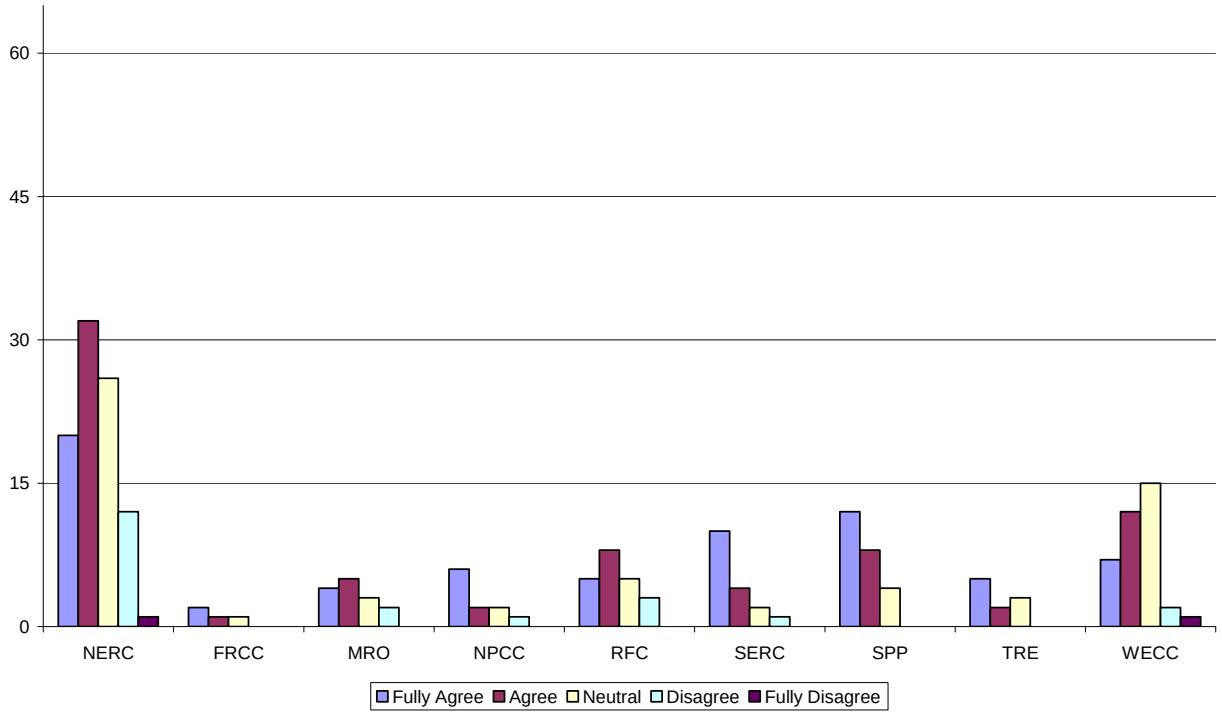
Information Technology

58. Information systems, services and facilities meet the needs of Registered Entities and other stakeholders.							
	NA – Not applicable or have no opinion	1 – Fully agree	2	3 – Neutral	4	5 – Fully Disagree	Response Count
NERC	16.5% (18)	18.3% (20)	**29.4% (32)**	23.9% (26)	11.0% (12)	0.9% (1)	109
FRCC	**89.2% (33)**	5.4% (2)	2.7% (1)	2.7% (1)	0.0% (0)	0.0% (0)	37
MRO	**68.2% (30)**	9.1% (4)	11.4% (5)	6.8% (3)	4.5% (2)	0.0% (0)	44
NPCC	**71.8% (28)**	15.4% (6)	5.1% (2)	5.1% (2)	2.6% (1)	0.0% (0)	39
RFC	**55.3% (26)**	10.6% (5)	17.0% (8)	10.6% (5)	6.4% (3)	0.0% (0)	47
SERC	**60.5% (26)**	23.3% (10)	9.3% (4)	4.7% (2)	2.3% (1)	0.0% (0)	43
SPP	**51.0% (25)**	24.5% (12)	16.3% (8)	8.2% (4)	0.0% (0)	0.0% (0)	49
TRE	**73.0% (27)**	13.5% (5)	5.4% (2)	8.1% (3)	0.0% (0)	0.0% (0)	37
WECC	**40.3% (25)**	11.3% (7)	19.4% (12)	24.2% (15)	3.2% (2)	1.6% (1)	62
						Comments and recommendations:	26
						answered question	**116**
						skipped question	**26**

ERO Survey - Information Technology
Question 58



ERO Survey - Information Technology
Question 58



	Comments and recommendations:
1	"NERC/RFC Q1: NERC's new website is more difficult to use than the old site. Finding information is often a challenge. The RFC Compliance portal is an improvement over the previous compliance site but weaknesses remain. The registered entities have many different ways they are required to use to submit information. The process of notifying registered entities of a compliance filing requirement is not designed well. SPOT check notices are not posted on either the compliance monitoring spreadsheet or the monthly reminder. "
2	Both the NERC and the WECC websites are difficult to use. They also do not always contain all desired information. When the WECC portal was first implemented it did not address all the mandatory standards. The WECC portal still has a few bugs, but is overall a better solution than submitting information via email.
3	Diligence should be exercised before information is posted on their public websites to ensure confidentiality of Member data.
4	Evolution of Web Portals for information submission is good. Websites need development to become more effective.
5	Exelon is concerned that the new portal that NERC has designed to acknowledge Alerts is not secure and is cumbersome to use for entities with multiple compliance contacts. Exelon also points out that the SERC Compliance Portal is well designed and easy-to-use.
6	FERC, NERC, and the regions should not be responsible for information systems, services, or facilities associated with planning or operating the bulk electric system.
7	It has never been easy to find information on the NERC website. It improved somewhat after the last update especially the search feature but it still has a ways to go. The MRO website is similar to the NERC site but with respect to the difficulty in finding the desired information. The MRO needs to implement a search feature to their website similar to what NERC has.
8	More attention needs to be paid to the less traditional roles of entities inside RTO/ISO environment.
9	NERC NERC could improve the level of systems and services to meet the needs of registered entities and other stakeholders. However, we do understand NERC's resource requirements and budget constraints.
10	NERC could better the level of systems and services required to meet the needs of registered entities and other stakeholders. However, we do understand NERC's resource requirements and budget constraints.
11	NERC is responsive to comments/suggestions on their Web site. MRO CDMS is well thought out and easy to use. WECC CDMS has been slow in development and is not always user friendly. WECC is working to improve the robustness of their CDMS. The WECC web site is not the easiest to find files/documents in.
12	NERC's new website is more difficult to use then the old site. Finding information is often a challenge.
13	Portal system at SERC & RFC is great. The new NERC website is confusing.
14	RCIS is known to generate inaccurate reports and occasionally stalls. It needs to be brought up to date in design and functionality. The NERC maintained TSIN site also needs to be updated.
15	RFC's conversion to the Portal System used by SERC has been a significant improvement. IMEA would appreciate consideration of ES-ISAC providing a one-stop reliability compliance reporting system, including CIP, EOP, and OE-417.
16	See previous comments on Website application. NERC should consider additional methods and technology to provide information and status reports of their activities.
17	Some electronic tools are better than others and should be reviewed on a case by case basis.
18	SPP is a party to the IRC Standards Review Comments, please refer to that submittal for our response to this question.
19	The FRCC has very good information systems both remotely and in facilities available when on site at their office.
20	The internet system to perform online activities has proven to be a very efficient and effective way to conduct business. Again, SPP and NERC have been available to assist CWL in a number of ways.
21	The Portal is a step in the right direction, but NERC and WECC should keep trying to improve their interface with the industry.

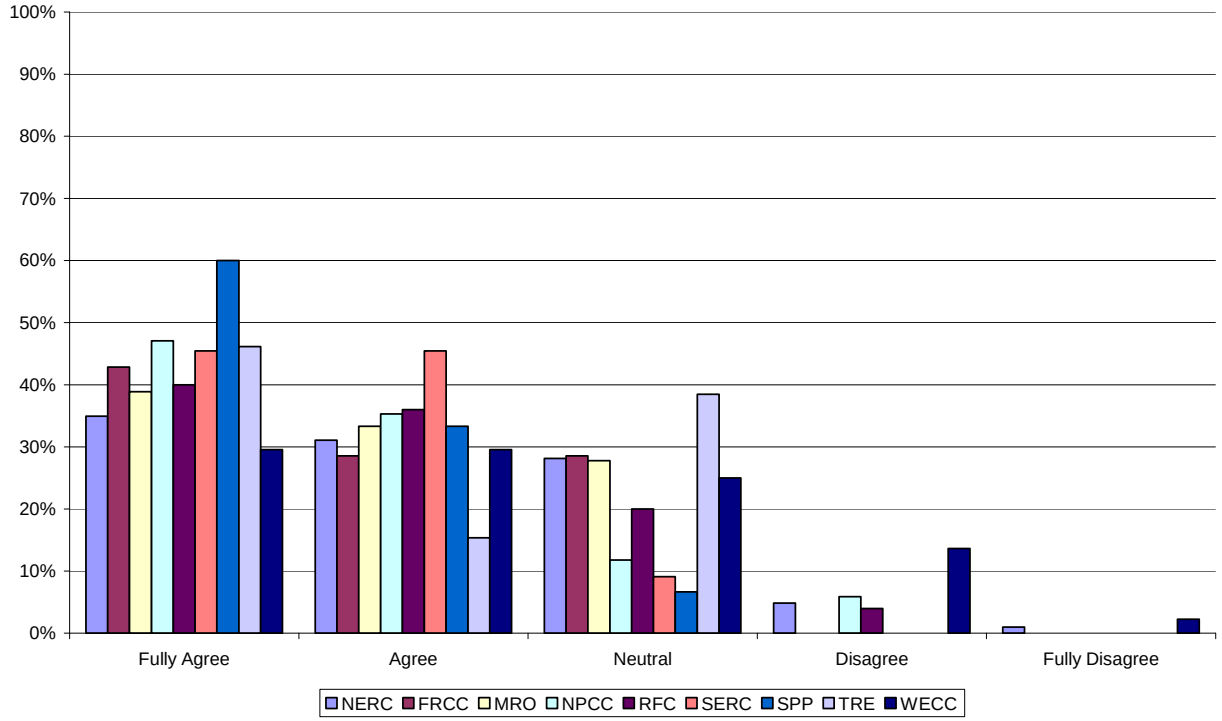
	Comments and recommendations:
22	The website is manageable if one knows what to look for, but it is not instructive.
23	The WECC portal still has major problems and was designed without regard for users needs. The WECC website and NERC website could both benefit from a table of contents or list of frequently accessed items. Each new website version creates the need for multiple people at multiple entities to spend hours of time trying to find where items have been moved/deleted/ or updated. Updates which are actual improvements are needed but updates without regard for user needs only adds to the frustration and time required to administer the compliance program without providing any reliability benefit to the Bulk Electric System.
24	There are opportunities to make fuller use of internet capabilities to enhance interaction with stakeholders and provide even greater transparency into the process.
25	WECC portal becomes more useful every day. Becoming a great website.
26	WECC's Web Portal is useful, and the new compliance site is good, but WECC's library of documents needs to be better cataloged and indexed.

Overall Satisfaction

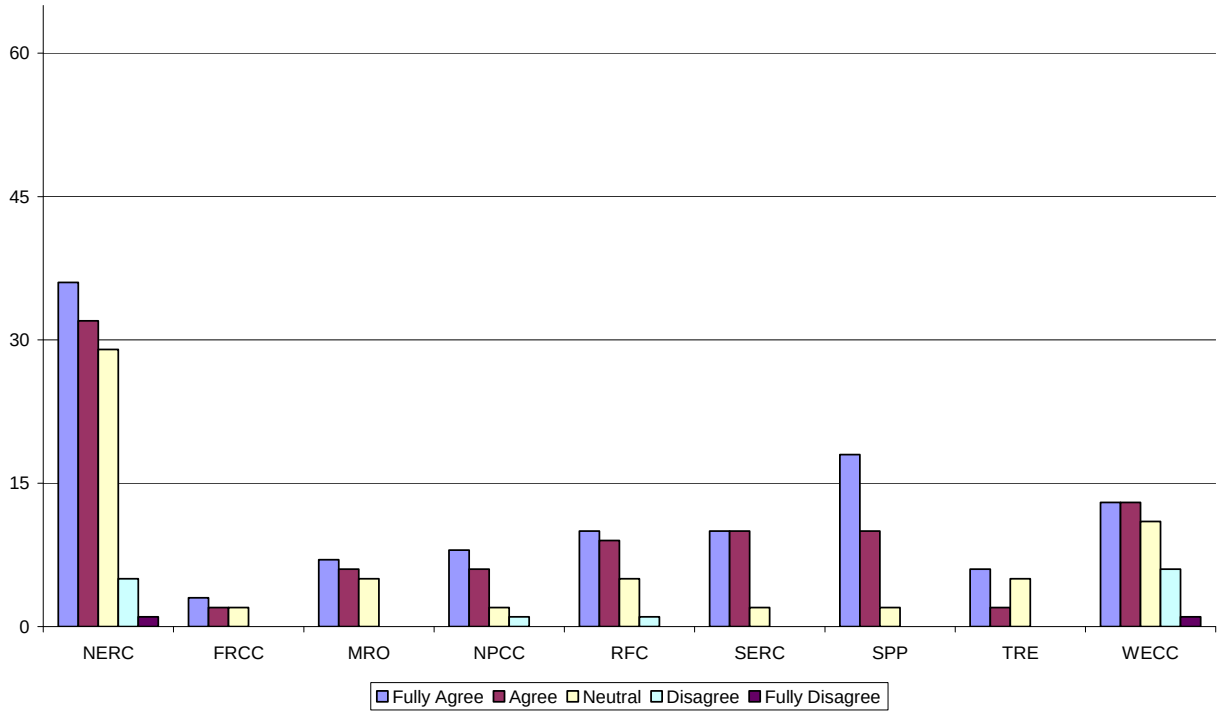
59. Staff is qualified, competent, well-prepared, and organized in the conduct of its statutory functions and in its communications with stakeholders.

	NA – Not applicable or have no opinion	1 – Fully agree	2	3 – Neutral	4	5 – Fully Disagree	Response Count
NERC	6.4% (7)	**32.7% (36)**	29.1% (32)	26.4% (29)	4.5% (5)	0.9% (1)	110
FRCC	**82.1% (32)**	7.7% (3)	5.1% (2)	5.1% (2)	0.0% (0)	0.0% (0)	39
MRO	**61.7% (29)**	14.9% (7)	12.8% (6)	10.6% (5)	0.0% (0)	0.0% (0)	47
NPCC	**60.5% (26)**	18.6% (8)	14.0% (6)	4.7% (2)	2.3% (1)	0.0% (0)	43
RFC	**51.0% (26)**	19.6% (10)	17.6% (9)	9.8% (5)	2.0% (1)	0.0% (0)	51
SERC	**55.1% (27)**	20.4% (10)	20.4% (10)	4.1% (2)	0.0% (0)	0.0% (0)	49
SPP	**43.4% (23)**	34.0% (18)	18.9% (10)	3.8% (2)	0.0% (0)	0.0% (0)	53
TRE	**65.0% (26)**	15.0% (6)	7.5% (3)	12.5% (5)	0.0% (0)	0.0% (0)	40
WECC	**32.3% (21)**	20.0% (13)	20.0% (13)	16.9% (11)	9.2% (6)	1.5% (1)	65
					Comments and recommendations:		36
						answered question	**118**
						skipped question	**24**

ERO Survey - Overall Satisfaction
Question 59



ERO Survey - Overall Satisfaction
Question 59



	Comments and recommendations:
1	1. Everyone has too many things to deal with.
2	1. FRCC staff is generally well prepared and organized for audits. 2. FRCC staff could improve in the timely preparation for compliance committee meetings. Documents need to be provided far enough in advance to provide time for review. Action items should have committed due dates which are usually met.
3	1. Staff is qualified, competent, well-prepared, and organized in the conduct of its statutory functions and in its communications with stakeholders. 2. Staff is timely and responsive in meeting the needs of reliability stakeholders and addressing issues affecting the reliability of the bulk power system. 3. Staff effectively communicates a vision and expectations and provides effective leadership to achieve that vision. 4. Organization is open and transparent in the conduct of its statutory functions. 5. Organization and staff are sufficiently independent of owners, operators, and users to effectively perform statutory duties with objectivity and integrity.
4	Again, Allegheny has nothing but the highest of praise for those individuals with whom it has dealt.
5	Agree
6	As mentioned lost and declining levels of technical experience and expertise in NERC staff is of pressing concern.
7	During the development and implementation of CWL's compliance program and throughout the 2008 compliance audit NERC and the SPP staff were very qualified, competent, well-prepared and organized. They went above and beyond to support the efforts of CWL.
8	Exelon feels that NERC and the Regions need to further review the skills that are required to successfully transition from voluntary to mandatory compliance. At NERC and the Regions, as in many organizations, there are varying degrees as to qualifications, competencies, preparation and organization of individual staff members.
9	Experience in this area is mixed. While certain of the staff is well qualified and competent, additional training and experience would be beneficial. Entities often experience conflicting communications from the same RRO making evaluations of the staff members less favorable and giving the RRO an image of not being organized and well-prepared with its messages.
10	I suggest a course taught in the utility industry called "Talk the Customer Talk". Please don't expect we are all lawyers and have a lot of time to read documents with much wordiness.
11	It appears that the organizations are making staff adjustments to meet this.
12	NERC NERC staff are generally of a high quality, however there is a need to ensure that NERC staff do not exert undue pressure on standard drafting teams and accurately present drafting team positions. While the objective of meeting established target dates is appropriate, it is important that the established process not be sacrificed in achieving it. There have been several incidences that certain standard elements were developed by entities other than the industry formed standard drafting teams. NPCC NPCC staff are qualified, competent, well-prepared and organized in the conduct of its statutory functions. Where NPCC can improve are (a) Ensure that stakeholders are considered for their inputs and concerns before establishing various courses of action and (b) Ensure improved responsiveness to address various stakeholder issues including those related to compliance programs, applicability of standards, and audits.
13	NERC & MRO staff are not familiar enough with the NERC Rules of Procedure and other governing documents, such as the Interim Agreement with MH.
14	NERC : We believe that this is highly dependent on individuals and on their area of responsibilities. SERC has made a great stride in hiring qualified, competent personnel and is well organized in conduct of its business.
15	NERC and RFC - The NERC and RFC staff quality varies from one staff person to another. Confidential feedback from users on how well staff helped them would be very beneficial.
16	NERC and the Region Reliability Organizations do not appear to have sufficient technical depth and experience to understand and evaluate some of the more complex grid reliability issues especially as it relates to relay and control schemes.

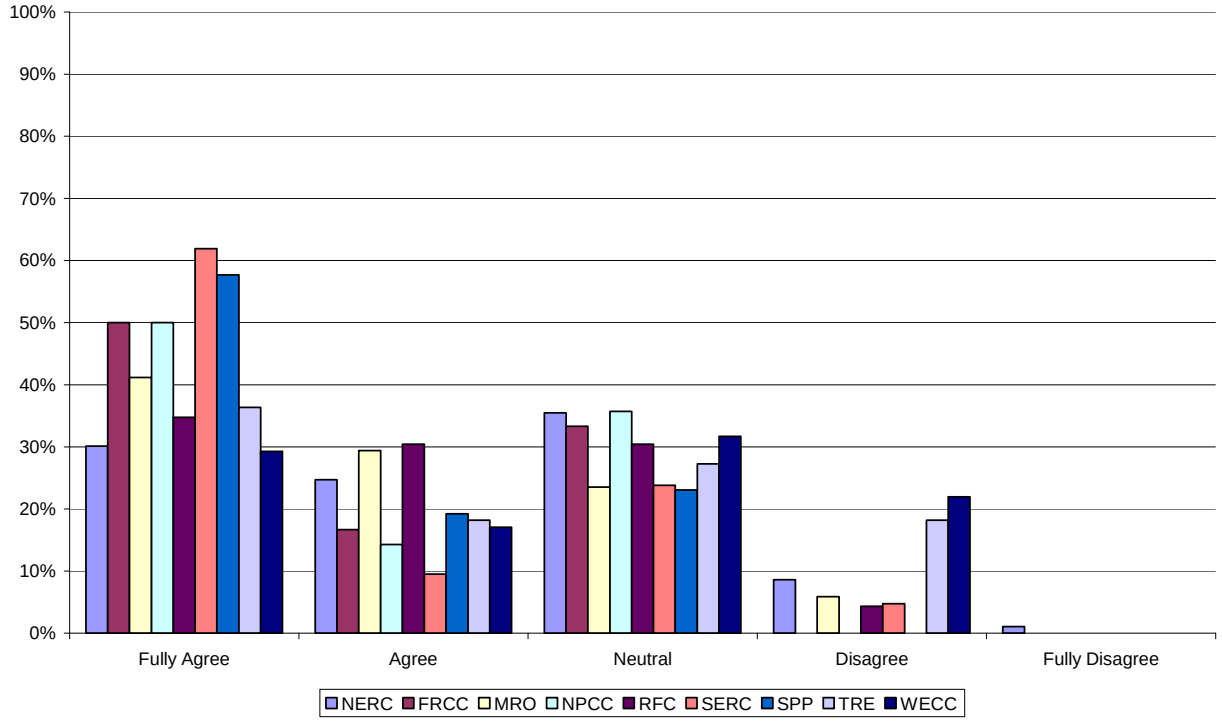
	Comments and recommendations:
17	NERC is performing its statutory functions as the ERO in an effective manner. There is an inherent step change the ERO must handle for compliance enforcement volume to get the industry into a steady state of compliance - especially in terms of processing violations to standards. They are the most qualified to perform these and must continue to provide greater clarity to these functions to the industry. Additional communications is needed and NERC should foster such through WebEx venues, discussion briefs issued by email, etc.
18	NERC staff is receptive and responsive to requests and inquiries. WECC staff has taken weeks and sometimes months to respond to requests and inquiries, even when an entity has repeatedly attempted to get a response. Written correspondences from the WECC compliance department have often contained factual errors and have been constructed in such a way that their intent and message are unclear.
19	NERC/RFC Q1: There is not uniform competency across NERC or RFC.
20	No Comment
21	NRECA finds the growing NERC and RE staffs are working to be responsive to requests for information from industry while maintaining the expected level of professionalism. This is challenging when NERC and the REs are undergoing rapid and significant change, and the relationships between NERC, the REs and FERC continues to evolve.
22	RFC Staff actually returns phone messages with complete and accurate responses.
23	See APPA written comments.
24	SPP concurs with the IRC Standards Review Committee's response related to standards development. We would add that NERC staff should be cognizant of the costs registered entities undertake in an audit. Though NERC's enforcement staff is fully dedicated to performing audits of registered entities, SPP has no staff dedicated to respond to audits and relies on operational staff. NERC staff must clearly articulate their intentions in audits and investigations and not retread areas covered in past audits..
25	SPP staff is always willing to help.
26	Staff is qualified and competent but appear to have their own agendas.
27	Staff is qualified but not always prepared. A lot seems to be subjective making the process frustrating. Seems as if there have been a lot of people changing positions, moving around the industry and a lot haven't quite settled into new positions. There are also lots of young people fresh out of college who have little or no utility experience.
28	Staff of both WECC and NERC appear to be very well-qualified, and they strive to communicate with their stakeholder. Compliance Staff of the WECC Region are professional, however, appear to have overstepped their bounds by rendering interpretations of various Requirements that go far beyond the written text of these Requirements. Examples of this include: December 2008 interpretation by WECC Audit Staff concerning the elements of protective systems that are included in the scope of PRC-005; Arbitrary conclusion concerning EOP-001 R1, that an entity is in violation if it doesn't have emergency assistance agreements with ALL neighboring BA's, as well as subjective quality assessments as to the content of those emergency assistance agreements; in R5 of EOP-001, WECC Auditors interpreted that all elements listed in the Attachment of the Standard are applicable, while the Requirement specifically provides the caveat "as applicable".
29	TAPS deals mostly with upper level staff and has found these employees competent, etc at all times.
30	The WECC staff was unfamiliar with its own CMEP as was revealed at the last Compliance User Group meeting. WECC's training process needs to be improved.
31	There is a concern over NERC and the regions insisting that alerts and other communication be sent only to the compliance contacts who may not be best suited to respond to an alert (vs. operations people). Registered entities should be given an option that provides for one or both compliance and operations folks being notified.
32	There is a lack of organization within the WECC compliance department. WECC Compliance staff needs to do a better job in communicating within WECC prior to communicating to registered entities. Communication to registered entities needs to be in writing, on formal letterhead if they are communicating a required action or policy. WECC Compliance staff needs to follow the prescribed processes. Senior Technical Staff at WECC is very qualified and competent in their assigned areas of expertise.

	Comments and recommendations:
33	There is a need to ensure that NERC staff do not exert undue pressure on standard drafting teams and accurately present drafting team positions. While the objective of meeting established target dates is appropriate, it is important that the established process not be sacrificed in achieving it. There have been several incidences that certain standard elements were developed by entities other than the industry formed standard drafting teams.
34	This reflects WECC's past performance from June 18, 2007, to date. WECC's ongoing efforts to make its process more responsive and timely are appreciated.
35	WECC staff consistently sends corrections to corrections for mistakes they make. They have little credibility.
36	Written standards could be improved. It leaves too much room for interpretation. Should get more stakeholder feedback before finalizing.

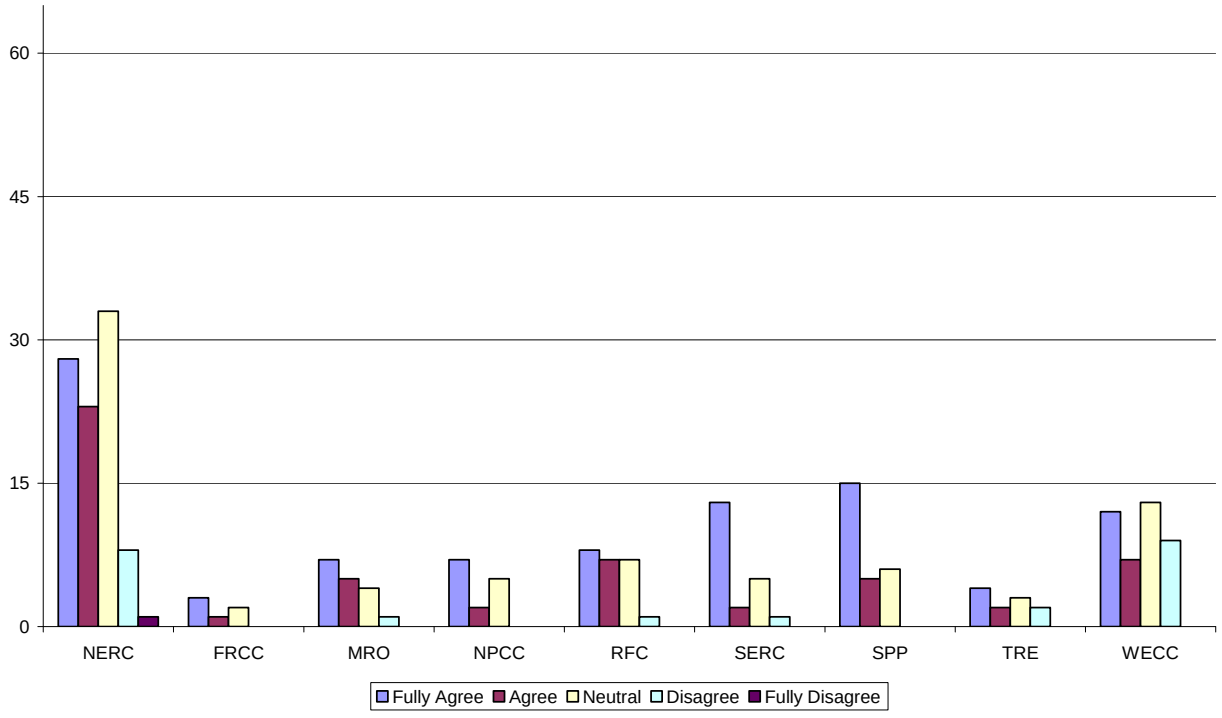
60. Staff is timely and responsive in meeting the needs of reliability stakeholders and addressing issues affecting the reliability of the bulk power system.

	NA – Not applicable or have no opinion	1 – Fully agree	2	3 – Neutral	4	5 – Fully Disagree	Response Count
NERC	13.1% (14)	26.2% (28)	21.5% (23)	**30.8% (33)**	7.5% (8)	0.9% (1)	107
FRCC	**84.2% (32)**	7.9% (3)	2.6% (1)	5.3% (2)	0.0% (0)	0.0% (0)	38
MRO	**62.2% (28)**	15.6% (7)	11.1% (5)	8.9% (4)	2.2% (1)	0.0% (0)	45
NPCC	**65.9% (27)**	17.1% (7)	4.9% (2)	12.2% (5)	0.0% (0)	0.0% (0)	41
RFC	**53.1% (26)**	16.3% (8)	14.3% (7)	14.3% (7)	2.0% (1)	0.0% (0)	49
SERC	**56.3% (27)**	27.1% (13)	4.2% (2)	10.4% (5)	2.1% (1)	0.0% (0)	48
SPP	**48.0% (24)**	30.0% (15)	10.0% (5)	12.0% (6)	0.0% (0)	0.0% (0)	50
TRE	**71.8% (28)**	10.3% (4)	5.1% (2)	7.7% (3)	5.1% (2)	0.0% (0)	39
WECC	**34.9% (22)**	19.0% (12)	11.1% (7)	20.6% (13)	14.3% (9)	0.0% (0)	63
					Comments and recommendations:		30
						answered question	**117**
						skipped question	**25**

ERO Survey - Overall Satisfaction
Question 60



ERO Survey - Overall Satisfaction
Question 60

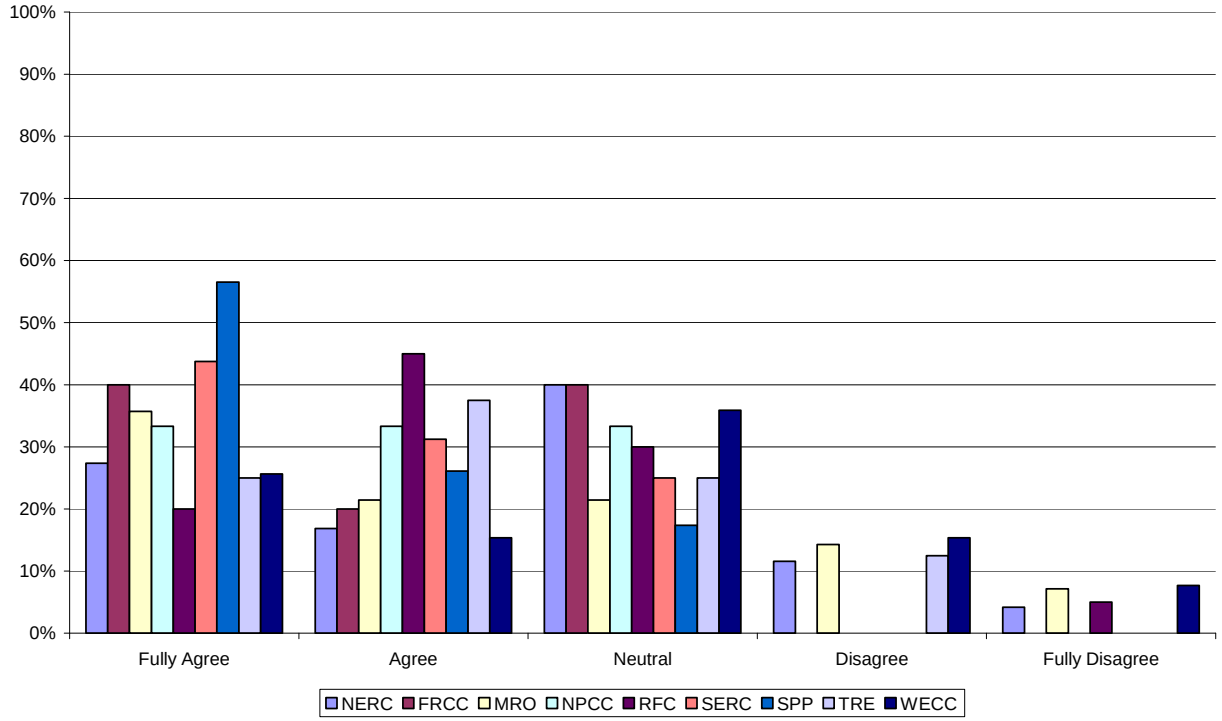


	Comments and recommendations:
1	Agree
2	As noted previously, Exelon feels that the violation processing backlog as well as the lack of timeliness in the event analyses have hindered the ability of the industry to learn from mistakes and incorporate process changes to improve reliability on a timely basis.
3	Both NERC and WECC staff are burdened by a poorly designed program that was implemented before thorough design and testing. Updates have been made in process, resulting in more work for all involved. In many cases Staff does not respond at all, either to written requests, phone calls, phone messages etc. The lack of response is generally considered to be a reluctance to answer questions on issues that are complicated and lack clear direction from NERC and FERC rather than a lack of courtesy. Phone calls to WECC Standards personnel are of little benefit. The Standards personnel are reluctant to answer questions because they do not want to provide incorrect information to an entity. For example, in August of 2008, during a WECC presentation, the presenter and his immediate supervisor, both WECC employees, contradicted each other during their presentations. The result was a White paper which took several (5) months to process. During that time, the contradiction was discussed and debated and resulted in a significant waste of time and resources.
4	Due to committee structures, getting timely results can be a challenge.
5	EPSA members have not found NERC staff to be particularly accessible or responsive (in a timely fashion) to questions regarding reliability standards. On the other hand, members have sometimes found Regional Entity staff to be much more cooperative and willing to field questions in a timely fashion.
6	Getting better.
7	I think they may be getting better but sometimes the time lag is not helpful.
8	NERC We believe that some NERC staff are over-worked. NERC should prioritize its work program to reallocate available resource to areas where there is a high intensity and volume of work. NPCC We do understand resource issues but believe that NPCC staff need to more responsive to stakeholder requirements and concerns.
9	NERC : Backlog of resolving compliance violation cases and completion of Event Analyses are some of the examples for the lower rating. SERC: We believe that comparatively SERC staff is performing better in this area.
10	NERC could improved on it's timeliness in a number of key areas - primarily of course the current backlog of violations. NERC should more closely monitory and pursue course corrections within the compliance enoforcement process in order to streamline the throughput of the violations. Also, timeliness and additional information concerning the full compliance process for those violations processed will help the industry toward both a greater degree of compliance and effectively a more reliable bulk power system.
11	NERC staff is receptive and responsive to requests and inquiries. WECC staff has taken weeks and sometimes months to respond to requests and inquiries, even when an entity has repeatedly attempted to get a response. Written correspondences from the WECC compliance department have often contained factual errors and have been constructed in such a way that their intent and message are unclear.
12	NERC started as stakeholder driven, but is becoming more FERC driven. NERC needs to get back to its roots and to the technical expertise of the industry.
13	NERC/RFC Q2: Some staff is responsive; staff in other areas are not responsive.
14	NPCC could have been more timely and responsive to stakeholders regarding the announcement of a change from the perfomance based BES definition to the 100kV BES definition. A common understanding regarding the assumptions of this change could have been more timely. Expectations of the registered entities need to be communicated timely with respect to implimentation time-frames.
15	Often times WECC compliance staff is either slow in responding to issues brought to their attention, or does not respond to them at all. The WECC Technical staff is efficient in responding to the industry.
16	SERC has improved in this area in the last year
17	Some of the staff at NERC do a good job of replying to emails and returning phone calls and some of the staff do not. It is very frustrating to not have a phone call returned or an email replied to.
18	Sometimes not so much. There is a good effort from WECC staff. The volume of information and requests can be overwhelming.

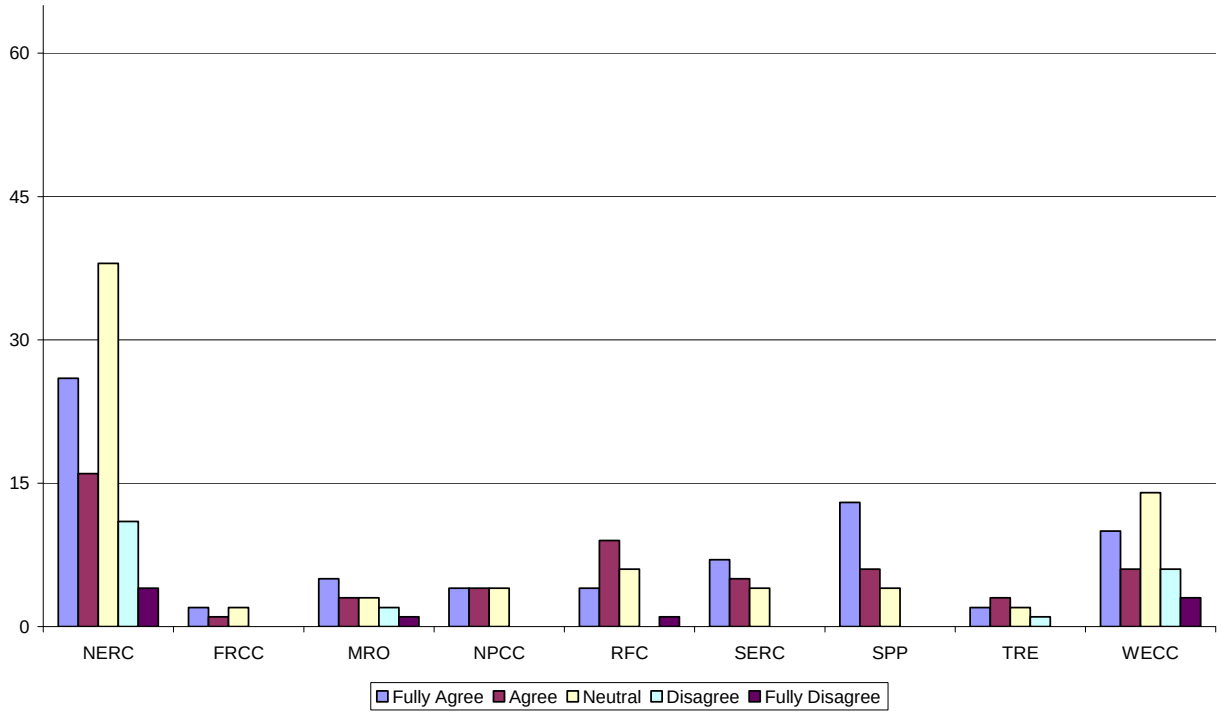
	Comments and recommendations:
19	SPP is a party to the IRC Standards Review Comments, please refer to that submittal for our response to this question.
20	Staff has generally responded to e-mail questions and telephone questions in a timely manner
21	Staff is consistently timely and responsive, but the NERC experience drain is impacting the meeting of stakeholder needs.
22	The backlog has impeded the Staff from responding to some of the simplest inquiries. However, inquiries with NERC Standards Staff and WECC Portal Administrators have been very responsive.
23	The PRC standards issues have been developing for several months now and still the problem has not been adressed by either NERC or WECC.
24	The process thus far has been too slow to address reliability issues in a timely manner.
25	The WECC is SLOW!
26	There is not clarity regarding roles and responsibilities among and between NERC, the Regional Entities, and the FERC. For example, there should be more process and procedure to determine who among NERC, the Regional Entities and the FERC is in charge of a disturbance investigation.
27	They have been very timely with all matters.
28	We are not sure what this statement means.
29	We believe that some NERC staff are over-worked. It also appears that staff is more focused on compliance than on many of the traditional tasks NERC did to support reliability downstream. NERC should prioritize its work program to reallocate available resource to areas where there is a high intensity and volume of work.
30	WECC Compliance Staff has been very non-responsive. Committed timelines have not been met, and the registered entities are left bewildered and uncertain about the status of open issues. In countless cases, we have had to repeat requests two and three times in order to receive responses. WECC fails to meet committed deadlines for acceptance of evidence, mitigation plans and completions of mitigation plans. While this may be understandable due to the ramp-up of activity related to compliance in the industry, it is nonetheless disrespectful of the entities that are being held accountable for such compliance and going far out of their way to meet the WECC-imposed deadlines. On the other hand, the remainder of WECC Staff (outside of the Compliance arm), are extremely responsive and timely with their support of the industry. They do a tremendous service to the region's entities.

61. Staff effectively communicates a vision and expectations and provides effective leadership to achieve that vision.							
	NA – Not applicable or have no opinion	1 – Fully agree	2	3 – Neutral	4	5 – Fully Disagree	Response Count
NERC	11.2% (12)	24.3% (26)	15.0% (16)	**35.5% (38)**	10.3% (11)	3.7% (4)	107
FRCC	**87.2% (34)**	5.1% (2)	2.6% (1)	5.1% (2)	0.0% (0)	0.0% (0)	39
MRO	**69.6% (32)**	10.9% (5)	6.5% (3)	6.5% (3)	4.3% (2)	2.2% (1)	46
NPCC	**71.4% (30)**	9.5% (4)	9.5% (4)	9.5% (4)	0.0% (0)	0.0% (0)	42
RFC	**60.8% (31)**	7.8% (4)	17.6% (9)	11.8% (6)	0.0% (0)	2.0% (1)	51
SERC	**65.2% (30)**	15.2% (7)	10.9% (5)	8.7% (4)	0.0% (0)	0.0% (0)	46
SPP	**54.9% (28)**	25.5% (13)	11.8% (6)	7.8% (4)	0.0% (0)	0.0% (0)	51
TRE	**79.5% (31)**	5.1% (2)	7.7% (3)	5.1% (2)	2.6% (1)	0.0% (0)	39
WECC	**39.1% (25)**	15.6% (10)	9.4% (6)	21.9% (14)	9.4% (6)	4.7% (3)	64
					Comments and recommendations:		19
						answered question	**115**
						skipped question	**27**

ERO Survey - Overall Satisfaction
Question 61



ERO Survey - Overall Satisfaction
Question 61

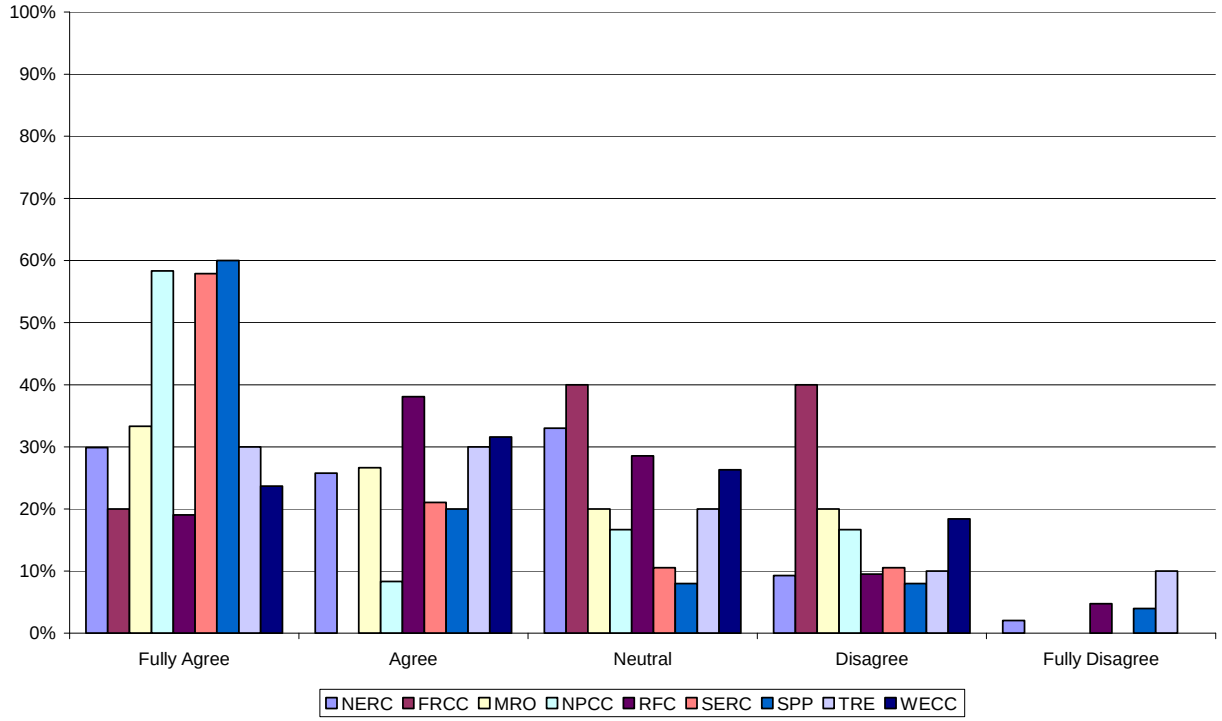


	Comments and recommendations:
1	1. Everyone is still learning. Best practices are being developed. Each utility has to do things on their own like "Risk Based Methodology" for defining critical assets.
2	Agree
3	Exelon feels that NERC is not performing or acting in an independent manner and in many cases, has provided too much deference to the opinions of FERC Staff in the Standards Development and Event Analysis processes.
4	NERC We haven't seen a vision statement or what NERC is trying to achieve. In fact, this is missing from NERC's strategy. NERC has not developed a vision as to how it plans to be an international ERO. Currently, it appears that NERC is only trying to fulfill its statutory functions and beyond that primarily responding to directives from the FERC. NERC needs to establish a balance between its obligations and responsibilities to the industry and the applicable jurisdictional authorities. NPCC NPCC has a vision and an effective leadership to achieve that vision. NPCC needs to ensure that its vision is not unduly influenced by any particular entity or jurisdictional authority
5	NERC does provide good leadership and vision - it must provide more communication of that vision and give more time to addressing the vision and scope of many of the activities such as performance monitoring, etc.
6	NERC has a strategic plan and annual business plans, but staff don't do a good enough job of communicating that plan throughout the year.
7	NERC seems to be struggling with their relationships with the regions and their delegations of authority. At times it seems as if NERC is driving the standards development and compliance implementation rather than providing the prescribed oversight. WECC's ability to be a leader for the western industry is less effective than it could be due to hard line interpretations they are making on compliance documentation.
8	NERC staff clearly communicates the vision and expectations to entities of the BES. It is growing in its role and there are growing pains to work through.
9	NERC: We are concerned that at times it is not clear that management and staff are clearly focused on what is best for reliability or whether they support the important role of stakeholders. WE are encouraged by the BOT chair's statement at the end of the Feb. 10th BOT meeting, reaffirming the Board's commitment to reliability, collaboration with stakeholders, and a North American focus. RFC: Appears more focused, see RFC strategic plan of May 2008.
10	No Comment
11	Prior to becoming an ERO , NERC's singular focus was reliability. Subsequent to becoming an ERO, it seems that this focus has been shifted to CMEP and also has been diverted into playing politics. SERC: SERC is providing effective leadership in the industry and its primary focus is reliability.
12	SPP is a party to the IRC Standards Review Comments, please refer to that submittal for our response to this question.
13	TANC doesn't know the vision and expectations of NERC and WECC. The WECC Strategic Planning process was not truly open to input from smaller registered entities. Even though TANC was interviewed, its comments were presented as outliers to the more frequent comments.
14	The Audit function impedes any clare communication of expectiations.
15	The standards keep getting more and more complex with no end in sight. We have not seen a vision for an ultimate goal or finish line.
16	There are plenty of meetings to dial into and conferences to go to. However, they all cover the entire set of standards. We are a GO and GOP and have less than 50 standards that apply. When attending a online call or conference, we spend 98% of the time listening to TO, TOP's, BA's, RC's ect talking about standards that don't even apply to us. Its a waste of time. I would like WECC and NERC to have break out sessions for GO and GOP's so that we can reduce the length of meeting and it all be applicable to what we are accountable for.
17	There is not a consistent communication of a vision, expectations or leadership from either group. WECC seems unsure of how to respond to questions for fear of being overridden by NERC and FERC. The solution would be for more communication from NERC that addressed regional concerns in a clear method. Interpretations provide a clear path for communication without revising the standard. Improving the turnaround time for Interpretations would greatly aid the entire industry.

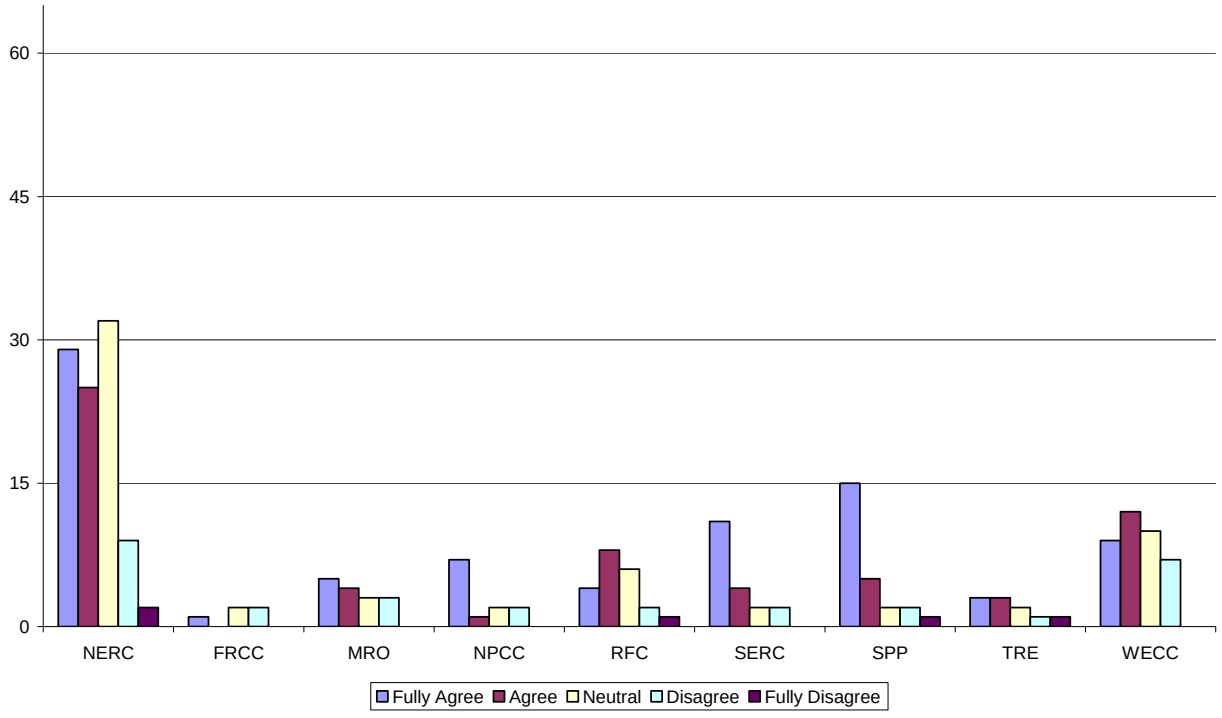
	Comments and recommendations:
18	We haven't seen a vision statement of what NERC is trying to achieve. In fact, this is missing from NERC's strategy. NERC has not developed a vision as to how it plans to be an international ERO. Currently, it appears that NERC is only trying to fulfill its statutory functions and beyond that primarily responding to directives from the FERC. NERC needs to establish a balance between its obligations and responsibilities to the entire industry. There also seems to be a disconnect between different program areas.
19	When NERC was certified by FERC as the ERO, NERC and the stakeholders had the same clear vision. Today, NERC's vision is not clear to stakeholders and it appears that NERC has changed their vision of the ERO.

62. Organization is open and transparent in the conduct of its statutory functions.							
	NA – Not applicable or have no opinion	1 – Fully agree	2	3 – Neutral	4	5 – Fully Disagree	Response Count
NERC	9.3% (10)	27.1% (29)	23.4% (25)	**29.9% (32)**	8.4% (9)	1.9% (2)	107
FRCC	**86.5% (32)**	2.7% (1)	0.0% (0)	5.4% (2)	5.4% (2)	0.0% (0)	37
MRO	**66.7% (30)**	11.1% (5)	8.9% (4)	6.7% (3)	6.7% (3)	0.0% (0)	45
NPCC	**70.7% (29)**	17.1% (7)	2.4% (1)	4.9% (2)	4.9% (2)	0.0% (0)	41
RFC	**57.1% (28)**	8.2% (4)	16.3% (8)	12.2% (6)	4.1% (2)	2.0% (1)	49
SERC	**59.6% (28)**	23.4% (11)	8.5% (4)	4.3% (2)	4.3% (2)	0.0% (0)	47
SPP	**51.0% (26)**	29.4% (15)	9.8% (5)	3.9% (2)	3.9% (2)	2.0% (1)	51
TRE	**73.7% (28)**	7.9% (3)	7.9% (3)	5.3% (2)	2.6% (1)	2.6% (1)	38
WECC	**38.7% (24)**	14.5% (9)	19.4% (12)	16.1% (10)	11.3% (7)	0.0% (0)	62
					Comments and recommendations:		23
						answered question	**115**
						skipped question	**27**

ERO Survey - Overall Satisfaction
Question 62



ERO Survey - Overall Satisfaction
Question 62

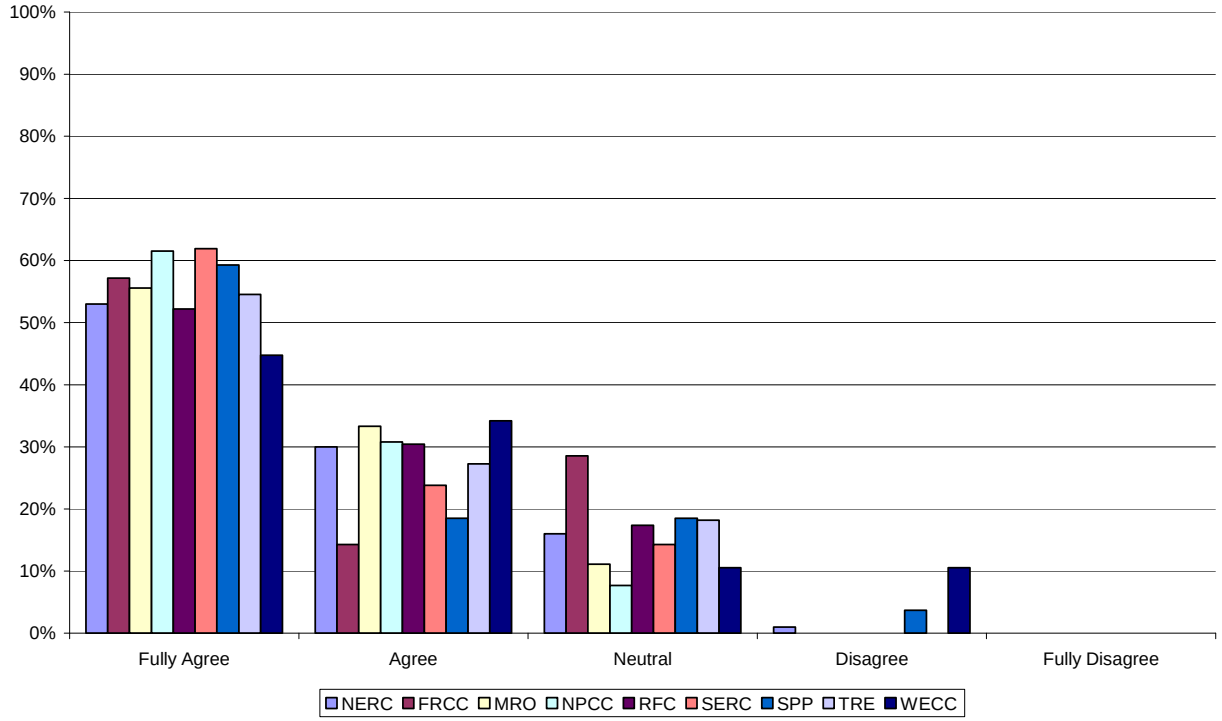


	Comments and recommendations:
1	1. The organizational structure, budget and financing are open. We are however, concerned about the recent move to exclude of stakeholders from the CMEP process which harms transparency. Stakeholders have been excluded in several ways, examples include - pressure to desist using volunteer auditors and the requirement to remove compliance committees from the process of reviewing violations. Every effort should be made find fair and equitable ways to include stakeholders in the process and to provide the opportunity to review and ask questions about proceedings.
2	Agree
3	As mentioned previously, the "black box" methodology for determining the penalty for non-compliance, coupled with the backlog of compliance violations, has not provided the openness and transparency necessary to learn from mistakes or to promptly resolve known concerns.
4	As noted earlier, Exelon does not feel that the Compliance Enforcement and Violation processes are handled in an open or transparent fashion.
5	As the processes are improved the functions will become more understood and show better transparency.
6	Most of the standards development process is transparent. We are concerned with regulatory influence in this process. Stakeholders don't have much input into the compliance process.
7	NERC Most of the standards development process is transparent. We are concerned with regulatory influence in this process. Stakeholders don't have much input into the compliance process. NPCC ---
8	NERC needs to balance the need for confidentiality of one party with the desire of the industry to learn timely lessons. Both can be done.
9	NERC should discourage FERC involvement in the day-to-day performance of its statutory functions. Given the FERC circumstances under which NERC has to operate, NERC is open and transparent.
10	NERC sometimes takes positions that promote unnecessary confidentiality or provide for limited input on selected decisions.
11	NERC staff does not make clear what the purpose of investigations are. NERC has not made clear what standards are under investigation and what information is requested for compliance investigations. NERC should provide this at the time a registered entity is notified. This not only prepares the entity, it ensures due diligence on NERC's part that there is indeed a need to open an investigation.
12	NERC/RFC Q4: Standards development is done well. For compliance, the process is not open and transparent. We do not receive information about pending violations and there is no way to calculate penalties.
13	NERC's public stakeholder processes are effectively open and transparent. WECC's separation of reliability standards functions from its other regional facilitation of cooperation functions appears to be neither adequate nor adequately communicated to registered entities.
14	No transparency in how compliance violation penalties are calculated and are they regionally consistent. While the regions point to NERC, there is no transparency for the users to understand the reasons for the heavy backlog of the compliance cases and event analyses. SERC: Dependent on NERC for final resolutions
15	None
16	Standards development is done well. For compliance, the process is not open and tranparent. We do not receive information about pending violaions and there is no way to calculate penalties.
17	The NERC and WECC Reliability Standards development groups have been very open and transparent. However, this is not the case for their Compliance Staffs. In addition, NERC continues to block the release of the Penalty Calculator.
18	The Penalty Calculator tool developed by NERC and used by WECC is not transparent. There is no excuse for this. It is an astonishing impediment to efficient and effective compliance enforcement.
19	The regions are much more open and transparent than NERC especially as it relates to compliance issues.
20	Too much influence by the large IOUs and the RTOs
21	We are interested to see how open the VRF determination process will be.

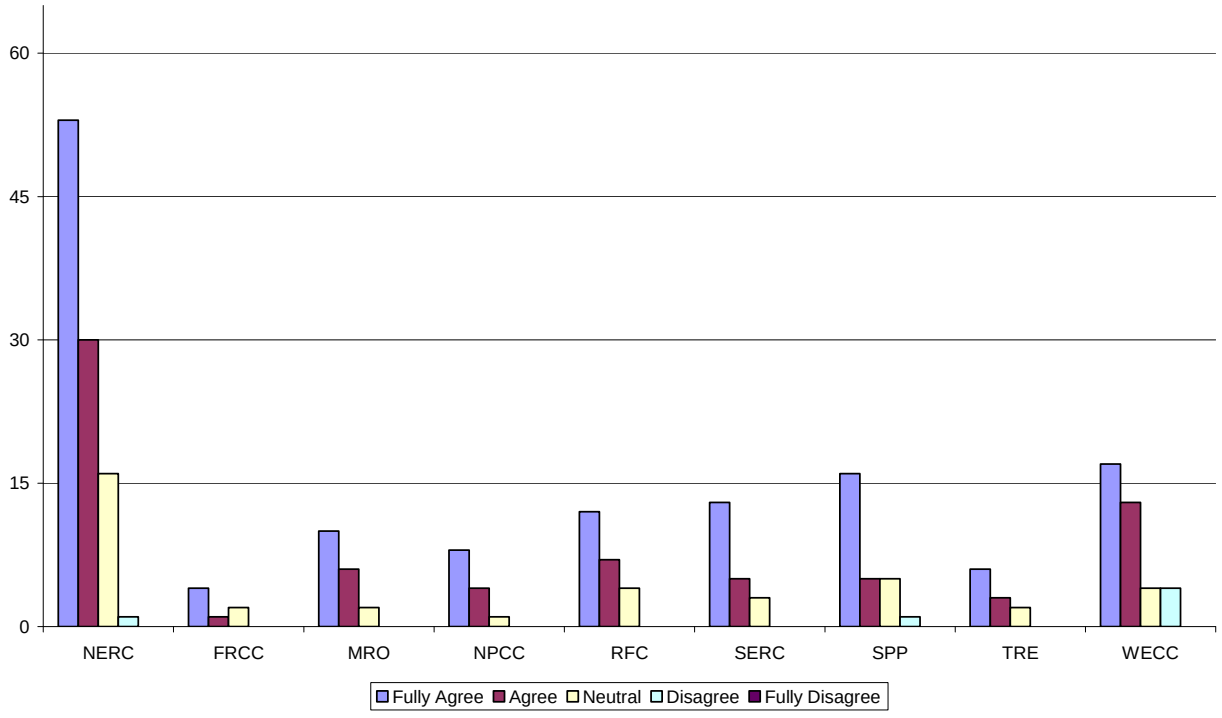
	Comments and recommendations:
22	WECC has delivered some surprizes via workshops and subsequent "white papers" in regard to PRC-005-1 inclusions. After the initial industry response to an August workshop, WECC became very open.
23	With the exception of the penalties for non compliance.

63. Organization and staff are sufficiently independent of owners, operators, and users to effectively perform statutory duties with objectivity and integrity.							
	NA – Not applicable or have no opinion	1 – Fully agree	2	3 – Neutral	4	5 – Fully Disagree	Response Count
NERC	7.4% (8)	**49.1% (53)**	27.8% (30)	14.8% (16)	0.9% (1)	0.0% (0)	108
FRCC	**81.6% (31)**	10.5% (4)	2.6% (1)	5.3% (2)	0.0% (0)	0.0% (0)	38
MRO	**60.9% (28)**	21.7% (10)	13.0% (6)	4.3% (2)	0.0% (0)	0.0% (0)	46
NPCC	**68.3% (28)**	19.5% (8)	9.8% (4)	2.4% (1)	0.0% (0)	0.0% (0)	41
RFC	**53.1% (26)**	24.5% (12)	14.3% (7)	8.2% (4)	0.0% (0)	0.0% (0)	49
SERC	**55.3% (26)**	27.7% (13)	10.6% (5)	6.4% (3)	0.0% (0)	0.0% (0)	47
SPP	**47.1% (24)**	31.4% (16)	9.8% (5)	9.8% (5)	2.0% (1)	0.0% (0)	51
TRE	**71.1% (27)**	15.8% (6)	7.9% (3)	5.3% (2)	0.0% (0)	0.0% (0)	38
WECC	**38.7% (24)**	27.4% (17)	21.0% (13)	6.5% (4)	6.5% (4)	0.0% (0)	62
					Comments and recommendations:		19
						answered question	**116**
						skipped question	**26**

ERO Survey - Overall Satisfaction
Question 63



ERO Survey - Overall Satisfaction
Question 63

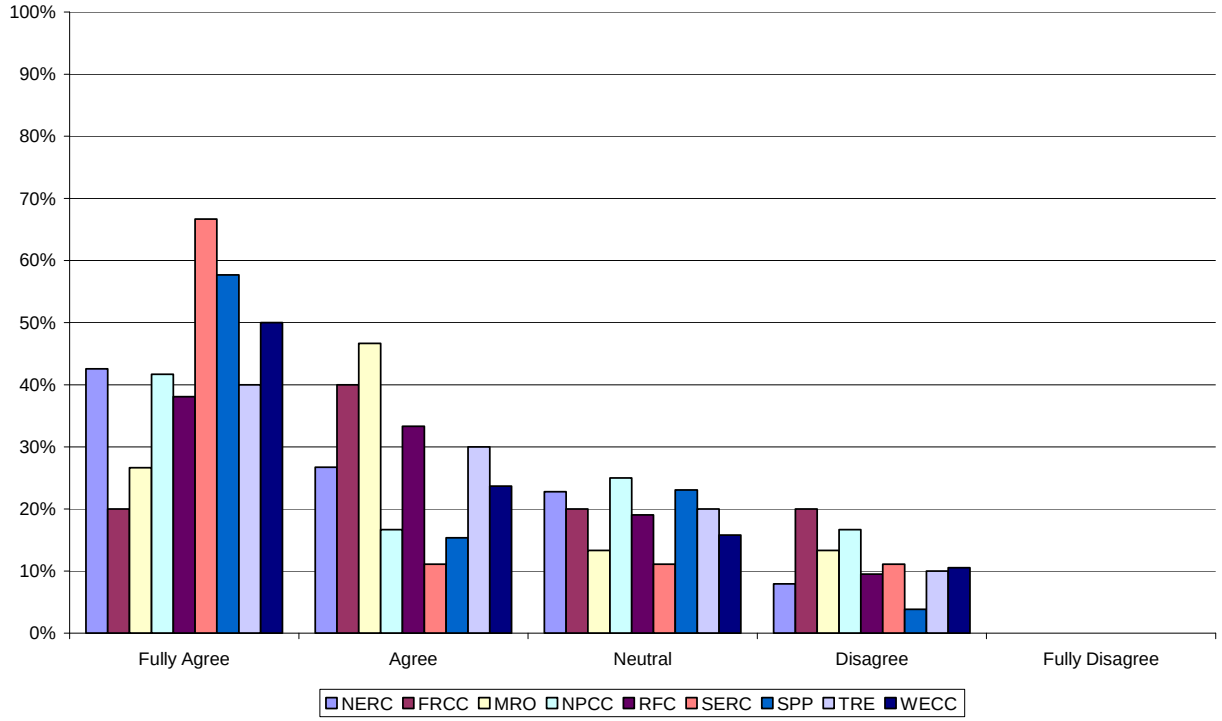


	Comments and recommendations:
1	Agree
2	Although the Board of Trustees is an independent board , and NERC staff are independent of owners, operators, and users, one cannot truly say NERC is an independent enterprise because of the manner in which FERC is interacting with NERC.
3	Because many WECC staff members are from the utility industry, and many of those from one sector of that industry, TANC believes there is a bias toward larger vertically integrated registered entities in most or all functions of WECC - including its traditional non-reliability standards related functions. This concern, of course, relates to WECC's ability to conduct fair and equitable audits.
4	Concerns of transmission owners seem to be accepted more readily than those of transmission users.
5	FRCC as an organizations and it's staff function independent of owners, operators and users to effectively perform their statutory duties with objectivity and integrity.
6	I believe that the SPP RE provides achievable goals and vision to function with registered entities. With communication we can achieve a reliable bulk system. The RE provides oversight and is objective when it comes to the standards.
7	Independence is sometimes questionable but they all take their positions seriously and act with integrity.
8	NERC : Some times they are too independent. For example, implementation of the alert process.
9	NERC and RFC have effectively provided the independence called for by statutory standards. As SPP performs its statutory duties, the use of common members to SPP RC and SPP RTO raises independence concerns.
10	NERC and RFC-NERC and RFC might not be sufficiently independent of FERC.
11	NERC as the ERO and its associated staff are sufficiently independent from the users, owners and operators of the bulk power system. The are performing their duties with objectivity and integrity.
12	NERC/WECC should consider adopting a conflict of interest policy for its employees and consultants to ensure that appropriate controls are in place to ensure that the RRO employees/consultants are sufficiently independent from the Registered Entities that they are charged with auditing, investigating, etc.
13	NERC's need for independence (both real or perceived) appears to have driven NERC further from stakeholder involvement (than necessary) and closer to FERC.
14	No Comment
15	SERC still using non-SERC personnel on compliance audits, not completey independent or objective.
16	Sometimes being 'sufficiently independent' can be counter-productive when the industry has the underlying expertise.
17	SPP is a party to the IRC Standards Review Comments, please refer to that submittal for our response to this question.
18	Too much influence by the large IOUs and RTOs
19	WECC goes to great lengths to ensure this separation is maintained.

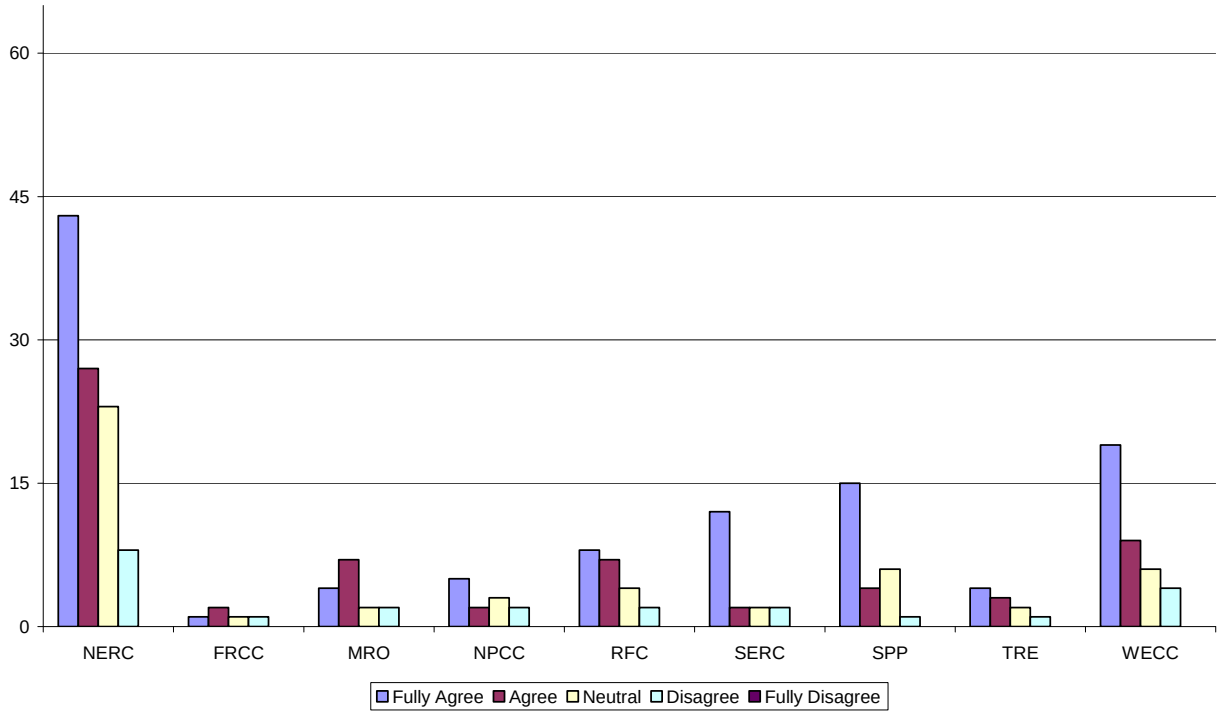
64. Organization provides reasonable notice and opportunity for public comment, due process, openness, transparency, and balance of interests in conducting its statutory functions.

	NA – Not applicable or have no opinion	1 – Fully agree	2	3 – Neutral	4	5 – Fully Disagree	Response Count
NERC	4.7% (5)	**40.6% (43)**	25.5% (27)	21.7% (23)	7.5% (8)	0.0% (0)	106
FRCC	**86.5% (32)**	2.7% (1)	5.4% (2)	2.7% (1)	2.7% (1)	0.0% (0)	37
MRO	**66.7% (30)**	8.9% (4)	15.6% (7)	4.4% (2)	4.4% (2)	0.0% (0)	45
NPCC	**70.7% (29)**	12.2% (5)	4.9% (2)	7.3% (3)	4.9% (2)	0.0% (0)	41
RFC	**57.1% (28)**	16.3% (8)	14.3% (7)	8.2% (4)	4.1% (2)	0.0% (0)	49
SERC	**60.9% (28)**	26.1% (12)	4.3% (2)	4.3% (2)	4.3% (2)	0.0% (0)	46
SPP	**49.0% (25)**	29.4% (15)	7.8% (4)	11.8% (6)	2.0% (1)	0.0% (0)	51
TRE	**73.7% (28)**	10.5% (4)	7.9% (3)	5.3% (2)	2.6% (1)	0.0% (0)	38
WECC	**38.7% (24)**	30.6% (19)	14.5% (9)	9.7% (6)	6.5% (4)	0.0% (0)	62
					Comments and recommendations:		23
						answered question	**115**
						skipped question	**27**

ERO Survey - Overall Satisfaction
Question 64



ERO Survey - Overall Satisfaction
Question 64

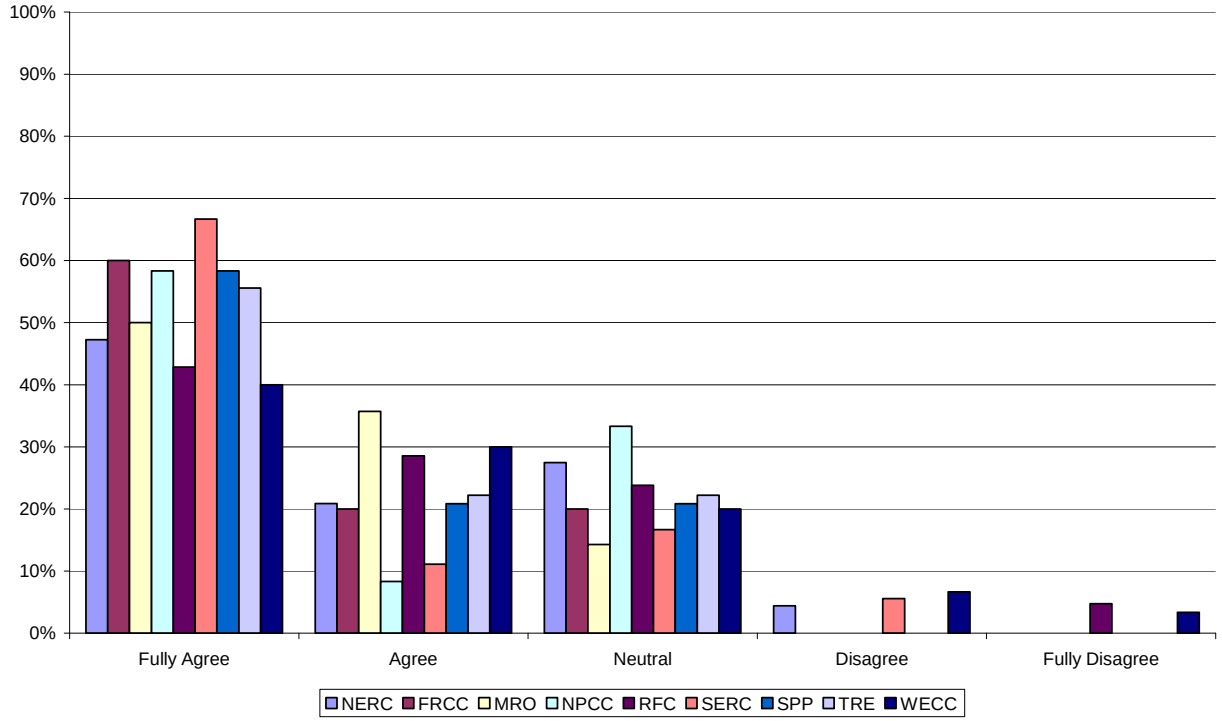


	Comments and recommendations:
1	1. However, there are occasional slips by FRCC, such as when it submitted its 2009 implementation plan without providing the members of the Compliance Committee the opportunity to review the document. We did not obtain a copy until after it was approved by NERC.
2	1. It is difficult for small utilities to take advantage of opportunities.
3	Agree
4	As previously discussed, WECC's openness and transparency leaves a lot to be desired.
5	Both NERC and the MRO seek input from the industry on their activities. Unfortunately, NERC cannot address comments where FERC has already offered a directive or opinion, making the comment period and comments ineffective.
6	Exelon does not feel that NERC consistently provides reasonable notice and opportunity for public comment, due process, openness, transparency, and balance of interests in conducting its statutory functions.
7	In pursuing reliability goals the costs to end-users of increased reliability are often not weighed against the value of the additional reliability to end users. In most cases the reliability gains from new or expanded crieria are probably worth any additional cost to consumers, but the law of diminishing returns should not be forgotten in developing standards.
8	NERC NERC does provide an open, balanced and transparent process. However, more recently, it seems that NERC is unduly influenced by FERC and the balance of interests is called into question. NPCC ---
9	NERC and WECC provide reasonable notice, opportunity for public comment, and due process; but both NERC and WECC need to improve on transparency.
10	NERC does provide an open, balanced and transparent process. However, more recently, NERC it seems that NERC is unduly influenced by FERC and the balance of interests is called into question.
11	NERC must ensure that undue influences by any one party or those without supportive and sound engineering, planning, operating and maintenance foundations are not allowed during standard development
12	NERC regional standard process needs improvement. Other regions should be able to vote on a regional standard when it introduces new definitions to the NERC glossary.
13	NERC sometimes takes positions that promote unnecessary confidentiality or provide for limited input on selected decisions.
14	NERC/RFC Q6: Standard Development -- due process and openess. For Compliance -- shrouded in secrecy.
15	No Comment
16	None
17	Other than Standards Development process openness and transparency are mostly invisible.
18	Public is given a very reasonable opportunity to comment on various matter dealing with standards development, compliance and overall protection of the bulk power system.
19	SPP is a party to the IRC Standards Review Comments, please refer to that submittal for our response to this question.
20	Standards Development -- due process and openess. Compliance -- shrouded in secrecy.
21	The work and information overloads an entity and takes away from concentrating on the really important item: the reliability of the bulk power system.
22	This entire survey has taken quite a bit of time (over 2 hours). Could it have been made more precise with recognition of who the Customers are so less time would be required? It is a good example of the extent of consideration for Customers, and wordiness comments I made above.
23	Yes, but again there is so much communication that is is difficult to keep up with it all. Nearly impossible to read all the changes and make time for comments. Large entities tend to dominate discussions because they have the resources to participate. Minority viewpoints and regional differences could be enhanced if a way was found to gain greater input from small entities.

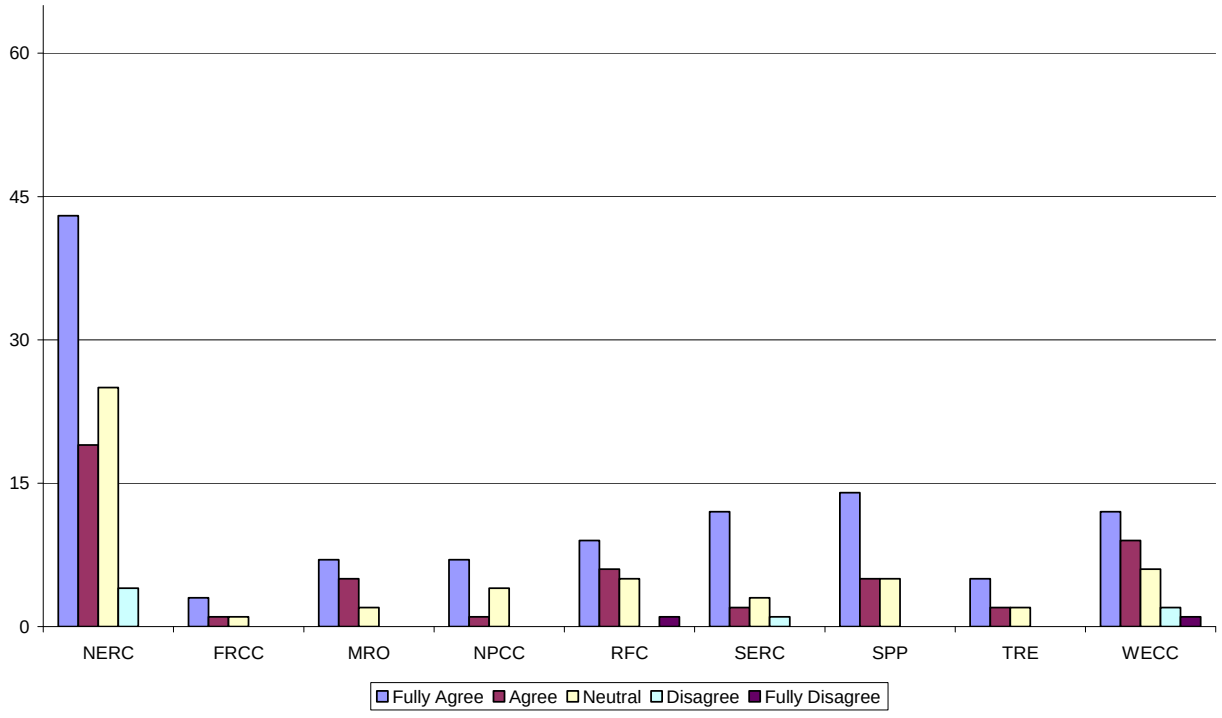
65. Organization has established rules that assure its independence of users, owners and operators of the bulk power system while assuring fair stakeholder representation in the selection of its directors and balanced decision-making in any NERC committee or subordinate organizational structure.

	NA – Not applicable or have no opinion	1 – Fully agree	2	3 – Neutral	4	5 – Fully Disagree	Response Count
NERC	16.5% (18)	**39.4% (43)**	17.4% (19)	22.9% (25)	3.7% (4)	0.0% (0)	109
FRCC	**86.5% (32)**	8.1% (3)	2.7% (1)	2.7% (1)	0.0% (0)	0.0% (0)	37
MRO	**67.4% (29)**	16.3% (7)	11.6% (5)	4.7% (2)	0.0% (0)	0.0% (0)	43
NPCC	**70.0% (28)**	17.5% (7)	2.5% (1)	10.0% (4)	0.0% (0)	0.0% (0)	40
RFC	**56.3% (27)**	18.8% (9)	12.5% (6)	10.4% (5)	0.0% (0)	2.1% (1)	48
SERC	**60.0% (27)**	26.7% (12)	4.4% (2)	6.7% (3)	2.2% (1)	0.0% (0)	45
SPP	**52.0% (26)**	28.0% (14)	10.0% (5)	10.0% (5)	0.0% (0)	0.0% (0)	50
TRE	**75.7% (28)**	13.5% (5)	5.4% (2)	5.4% (2)	0.0% (0)	0.0% (0)	37
WECC	**50.8% (31)**	19.7% (12)	14.8% (9)	9.8% (6)	3.3% (2)	1.6% (1)	61
						Comments and recommendations:	16
						answered question	**116**
						skipped question	**26**

ERO Survey - Overall Satisfaction
Question 65



ERO Survey - Overall Satisfaction
Question 65

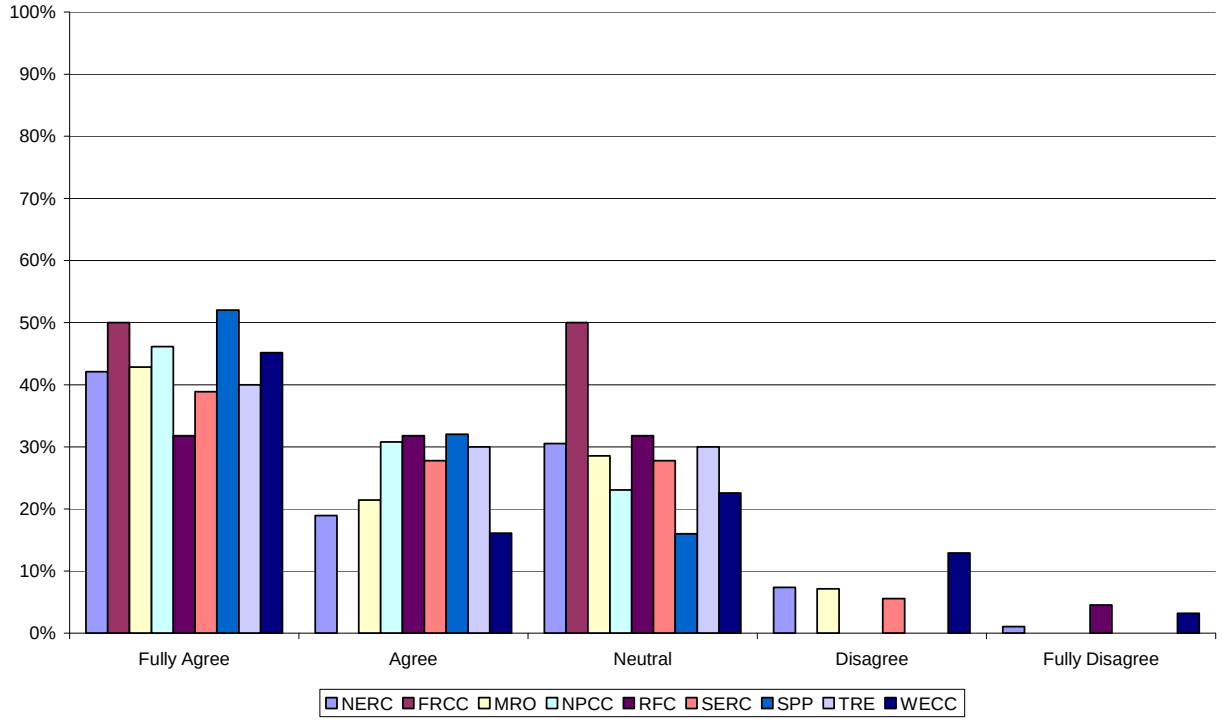


	Comments and recommendations:
1	Additional transparency around the selection process would be useful to give entities the objective criteria to be used for selection of members for the various committees.
2	Agree
3	If WECC has such rules, TANC does not consider them clear or adequately communicated.
4	In general, the rules for nominating and populating NERC committees are clear and assure independence. Exelon does have some concerns that these same rules are not used for the Compliance and Certification Committee (CCC) or for the Critical Infrastructure Protection Committee (CIPC).
5	It is difficult for the little guy to participate. The process is open to participation - but the reality of small utility participation is that it just costs too much to fly to NJ.
6	Many obligations imposed on entities are enforced indirectly via the Rules of Procedures. This indirect approach allows NERC to demand all kinds of data and special assessments from entities without consideration for cost or benefit to anyone. All such obligations should be based on requirements contained in the standards. If the request is outside the standards, then NERC should post the request for comment with a justification for the need and a clear outline of the benefits.
7	NERC NERC does have processes in place to assure its independence of users, owners and operators of the bulk power system while assuring fair stakeholder representation in the selection of its directors and balanced decision-making in any NERC committee or subordinate organizational structure. These processes are stakeholdered with the industry and are themselves not problematic , however the application of these processes is becoming a significant concern to the industry. NPCC ---
8	NERC does have processes in place to assure its independence of users, owners and operators of the bulk power system while assuring fair stakeholder representation in the selection of its directors and balanced decision-making in any NERC committee or subordinate organizational structure. These processes are stakeholdered with the industry and are themselves not flawed but the flawed application of these processes is a big concern to the industry.
9	NERC has watered down its technical committees by not letting each Region have a representative.
10	NERC should follow the processes set out in their Rules, and should continue to work with Canadian entities to ensure appropriate handling of confidential data, and establishment of standards.
11	No Comment
12	Our concern is that much deference is being given to the FERC staff in most activities including development of the Standards.
13	RFC- RFC needs to allow any utility in the RFC region the opportunity to participate on its board and committees even if they are not an RFC member. This is not the case at this time which means the process is not fair and open to all. The RFC standards voting process needs to be changed. The current process is not fair to smaller utilities and a simple majority with no sector weighting allows a standard to pass. A small utility is allowed one vote; however, a bigger utility is allowed as many as ten votes. This happens because each one of its ten subsidiaries gets a vote. This gives a bigger utility a distinct advantage over all the smaller utilities (not a fair process). We believe that the RFC voting process should be the same as the NERC voting process.
14	SPP is a party to the IRC Standards Review Comments, please refer to that submittal for our response to this question.
15	This is an area of continuing work in progress.
16	Transmission users need additional representation.

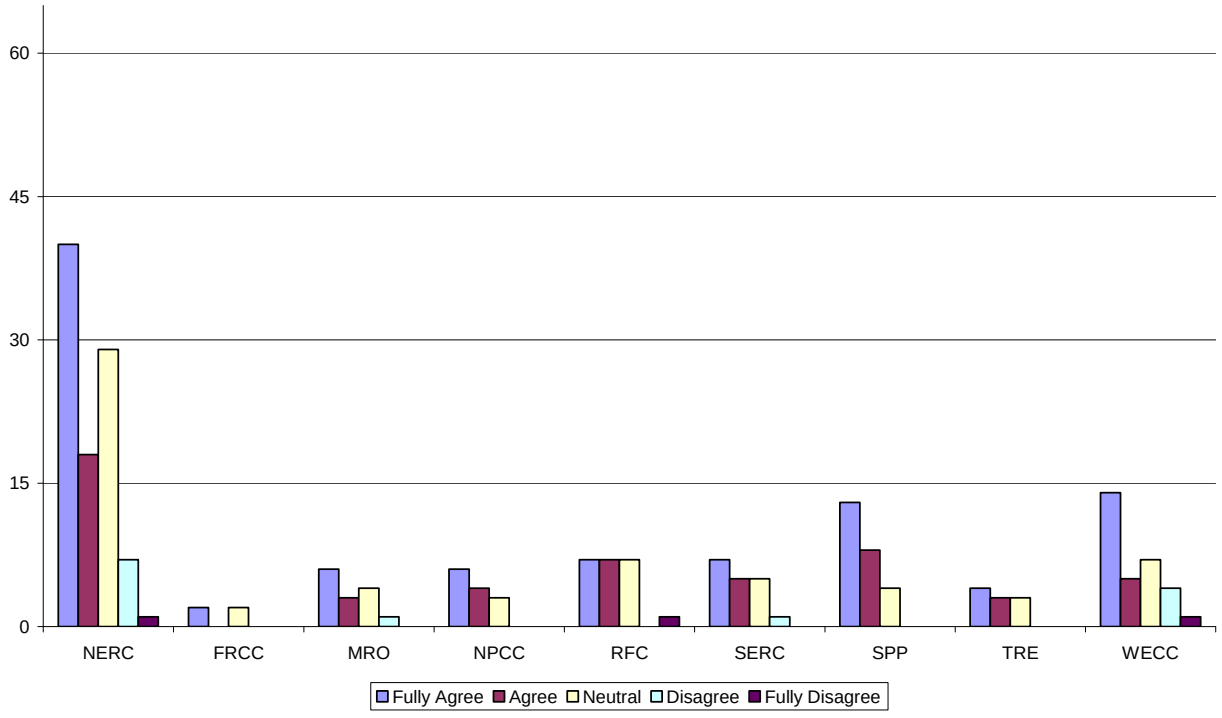
66. Organization provides for fair and balanced stakeholder representation in applicable areas of decision-making.

	NA – Not applicable or have no opinion	1 – Fully agree	2	3 – Neutral	4	5 – Fully Disagree	Response Count
NERC	12.0% (13)	**37.0% (40)**	16.7% (18)	26.9% (29)	6.5% (7)	0.9% (1)	108
FRCC	**88.9% (32)**	5.6% (2)	0.0% (0)	5.6% (2)	0.0% (0)	0.0% (0)	36
MRO	**67.4% (29)**	14.0% (6)	7.0% (3)	9.3% (4)	2.3% (1)	0.0% (0)	43
NPCC	**67.5% (27)**	15.0% (6)	10.0% (4)	7.5% (3)	0.0% (0)	0.0% (0)	40
RFC	**54.2% (26)**	14.6% (7)	14.6% (7)	14.6% (7)	0.0% (0)	2.1% (1)	48
SERC	**59.1% (26)**	15.9% (7)	11.4% (5)	11.4% (5)	2.3% (1)	0.0% (0)	44
SPP	**50.0% (25)**	26.0% (13)	16.0% (8)	8.0% (4)	0.0% (0)	0.0% (0)	50
TRE	**73.0% (27)**	10.8% (4)	8.1% (3)	8.1% (3)	0.0% (0)	0.0% (0)	37
WECC	**50.0% (31)**	22.6% (14)	8.1% (5)	11.3% (7)	6.5% (4)	1.6% (1)	62
						Comments and recommendations:	22
						answered question	**115**
						skipped question	**27**

ERO Survey - Overall Satisfaction
Question 66



ERO Survey - Overall Satisfaction
Question 66

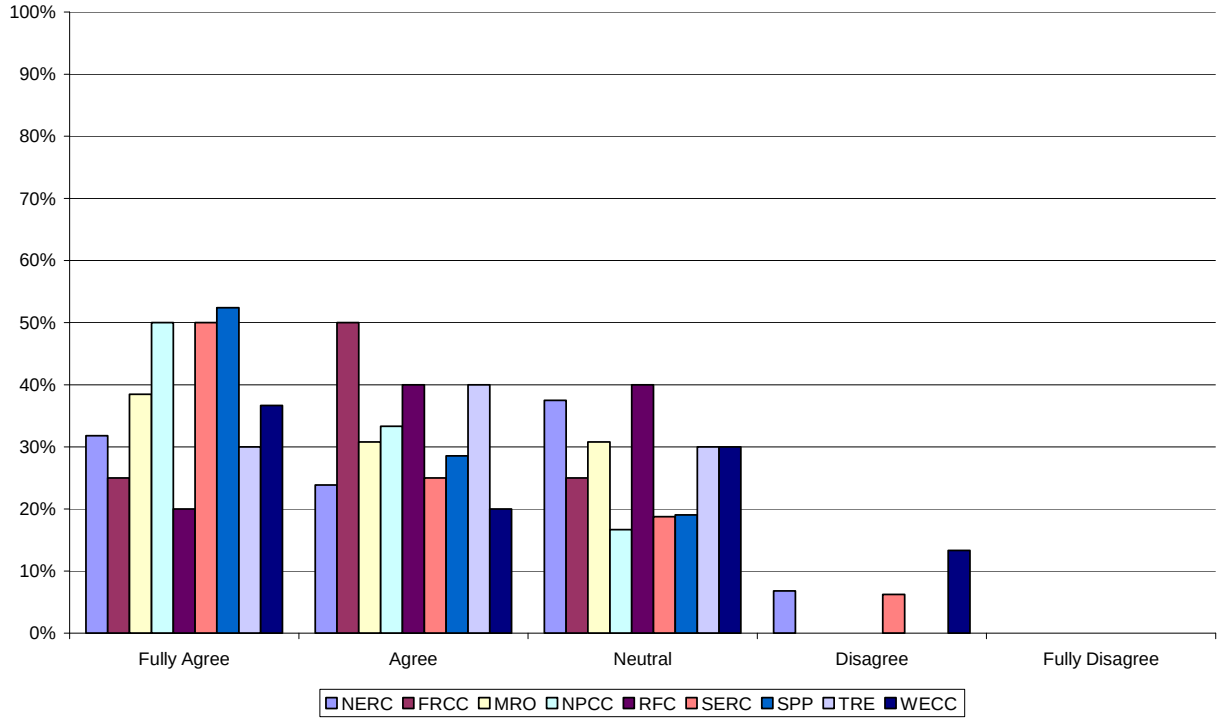


	Comments and recommendations:
1	1. Small utilities don't have the resources to be involved as much as they should.
2	Agree
3	Exelon is concerned that NERC has not supported stakeholder input in issues before FERC. For example, following the stakeholder workshop on the functions of Distribution Providers and Load Serving Entities, NERC staff reversed their opinions in their filing at FERC.
4	GO/GOPs registered as a TO/TOP have not had a fair opportunity to work with NERC and WECC to determine a reasonable subset of Standards that should apply to this type of Registered Entity.
5	IMEA is not able to adequately comment due to limited resources available to monitor such initiatives. IMEA supports comments submitted by the Transmission Access Policy Study Group (TAPS) and the American Public Power Association (APPA).
6	It is hard for a small entity to keep informed and stay on top of all the changes. Many of the larger entities have dedicated staff that track NERC and SPP issues.
7	Large entities tend to dominate because they have the resources necessary to participate.
8	NERC While there is fair representation on standing committees, it appears that these committees are now, at best, advisory. NPCC ---
9	No Comment
10	None
11	RFC-please see comments for question 7 on page 54.
12	SERC uses chairs of its Committees to be on the SERC Standards Committee. Since most committee particapants are from the larger companies, since they have the staffing to get folks there, this Committee is run by the larger companies. Should be staffed via sectors.
13	Small transmission owning TOPs are not represented.
14	SPP is a party to the IRC Standards Review Comments, please refer to that submittal for our response to this question.
15	Stakeholders' representation is provided but, again it appears that much deference is being given to the FERC staff.
16	TANC needs more information to provide a definitive answer. TANC believes that the WECC Board is heavily weighted to be responsive to FERC matters and to reliability standards issues. It appears that traditional roles are either being reduced or pushed to the background.
17	The electrical industry has a say in many issues at NERC. But the Commission can stay an issue via a NOPR, the industry comments and the Commission views become policy. Where does the Commission get its information if it is not coming from the electrical utilities that are keeping the lights on?
18	The process for commenting on new standards is confusing and not clearly communicated.
19	The Registered Ballot Body segments never went through an open process and put too much weight on "minor" segments which have a lesser impact on reliability.
20	We are concerned by FERC staff influence in decision-making and in the standards process.
21	WECC seems to make some decisions, such as their "audit approach" to a given standard, however, without first seeking and considering stakeholder input and perspectives.
22	While there is fair representation on standing committees, it appears that these committees are now, at best, advisory.

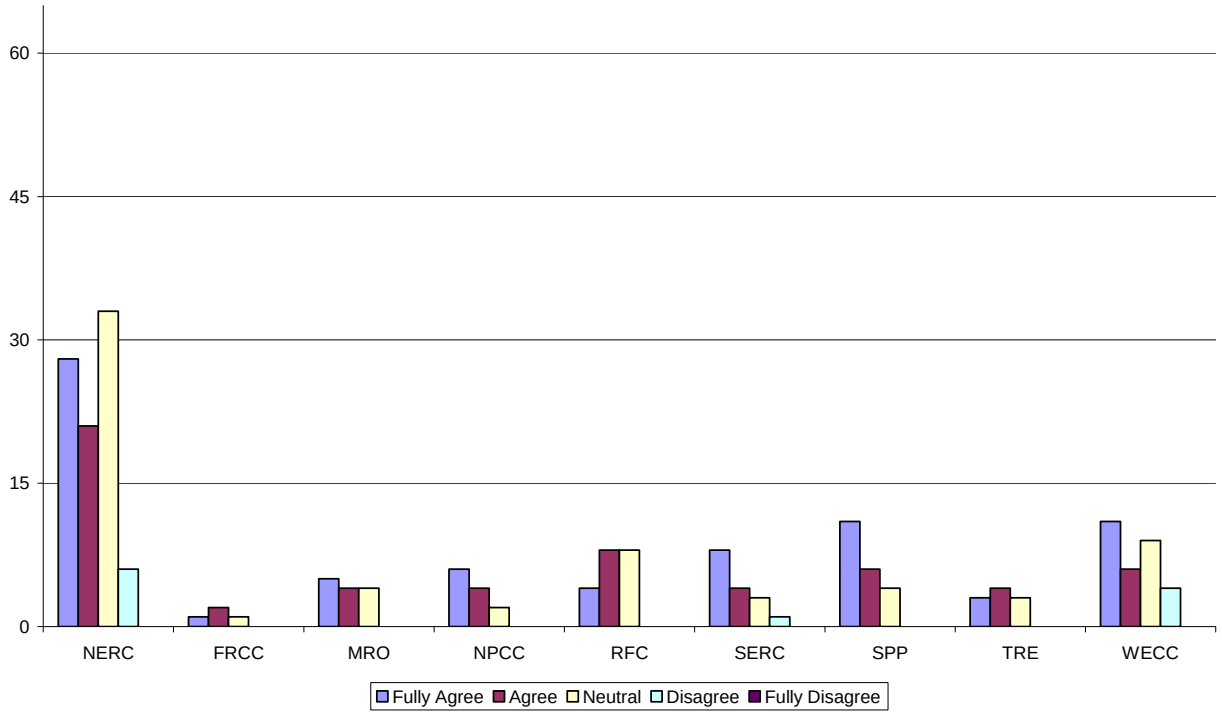
67. Organization is effective in using stakeholder resources in the conduct of its statutory functions.

	NA – Not applicable or have no opinion	1 – Fully agree	2	3 – Neutral	4	5 – Fully Disagree	Response Count
NERC	17.8% (19)	26.2% (28)	19.6% (21)	**30.8% (33)**	5.6% (6)	0.0% (0)	107
FRCC	**88.9% (32)**	2.8% (1)	5.6% (2)	2.8% (1)	0.0% (0)	0.0% (0)	36
MRO	**70.5% (31)**	11.4% (5)	9.1% (4)	9.1% (4)	0.0% (0)	0.0% (0)	44
NPCC	**70.0% (28)**	15.0% (6)	10.0% (4)	5.0% (2)	0.0% (0)	0.0% (0)	40
RFC	**58.3% (28)**	8.3% (4)	16.7% (8)	16.7% (8)	0.0% (0)	0.0% (0)	48
SERC	**63.6% (28)**	18.2% (8)	9.1% (4)	6.8% (3)	2.3% (1)	0.0% (0)	44
SPP	**57.1% (28)**	22.4% (11)	12.2% (6)	8.2% (4)	0.0% (0)	0.0% (0)	49
TRE	**73.0% (27)**	8.1% (3)	10.8% (4)	8.1% (3)	0.0% (0)	0.0% (0)	37
WECC	**51.6% (32)**	17.7% (11)	9.7% (6)	14.5% (9)	6.5% (4)	0.0% (0)	62
						Comments and recommendations:	22
						answered question	**114**
						skipped question	**28**

ERO Survey - Overall Satisfaction
Question 67



ERO Survey - Overall Satisfaction
Question 67



	Comments and recommendations:
1	Agree
2	As mentioned previously, RFC has the potential for duplicity with the RTOs.
3	Both do a good job of this, SERC takes it too far in some cases.
4	Committees and task forces are represented by stakeholders within all sectors
5	Further work should be done in improving efficiency in stakeholder involvement.
6	IMEA is not able to adequately comment due to limited resources available to monitor such initiatives. IMEA supports comments submitted by the Transmission Access Policy Study Group (TAPS) and the American Public Power Association (APPA).
7	My understanding is that NERC's position is not to use stakeholder resources to help support its statutory functions.
8	NERC The NERC reliability standards apply to the majority of the stakeholders in the industry – as users, owners and operators of BES facilities. As such, stakeholders' influence in the decision making on policies and processes that govern standards development will enhance buy-in by the entities to which the standards will eventually apply and facilitate willing compliance to ensure reliability. There have been indications recently that industry influence is on the decline, not by choice but by virtue of structural exclusion and by strict adherence to regulatory directives or deference to regulators' preference. An example is the Corporate Governance and Human Resources Committee's (CGHRC) proposal to separate the approval process for the compliance elements (VRFs and VSLs) from standard approval process, which appears to be insensitive to industry's overwhelming preference to ballot them together and without any involvement of the MRC. Another example is the development of VRFs for the ATC standards by NERC staff as opposed by the standard drafting team. NPCC ---
9	NERC Alerts - Contact information provided by entities should not be overwritten by regional entity contact information.
10	NERC and RFC-NERC and RFC need to place more emphasis on the technical expertise of stakeholders and there needs to be more outreach to smaller utilities.
11	NERC and the MRO must address the problem of "free riders". Some entities bear a disproportionate burden in providing resources to NERC and the MRO through committees and drafting teams. There is a risk of fatigue and burnout for those who are continuously participating in ERO activities. NERC/MRO should develop a process to ensure that an adequate level of stakeholder expertise is available before embarking on a project.
12	NERC voting members are allowed to vote on reliability standards as long as they pre-register to vote. It appears that very often those casting their ballots do not always understand the issues surrounding the standard or have direct responsibility under the standard. A process whereby the Registered Entity is given notice of a vote (not just the registered members) would be useful so that entities can ensure that those directly impacted by the standard are the right individual's casting the entity's vote.
13	NERC/FRCC manage fiscal resources well.
14	NERC/RFC Q9: Agree in Standards Development; however, disagree in Compliance (which is appropriate).
15	NERC's public stakeholder processes are effectively open and transparent. WECC has not found a way to ensure smaller entity inclusion in its many new activities.
16	Problems exist whinin using stakeholder resources in Compliance.
17	Resources made available to the standard drafting teams by the industry need to be used more efficiently. Objectives of the teams need to be streamlined, and access to technical writers should be provided. Meetings should be less frequent, but longer in duration in order to reduce the travel cost of the organization providing the resources.
18	See response to Section 2, question 4, above.
19	SERC is to be commended for being only one of two Regions that incorporate SERC member volunteers in performing reliability audits. This not only brings industry expertise to the audit team, but allows the volunteers to take auditing "best practices" back to their company which will enhance the overall quality of compliance.
20	SPP is a party to the IRC Standards Review Comments, please refer to that submittal for our response to this question.

	Comments and recommendations:
21	Stockholders resources are used but their effectiveness is hindered when NERC/FERC staff exerts undue pressure.
22	The NERC reliability standards apply to the majority of the stakeholders in the industry – as users, owners and operators of BES facilities. As such, stakeholders' influence in the decision making on policies and processes that govern standards development will enhance buy-in by the entities to which the standards will eventually apply and facilitate willing compliance to ensure reliability. There have been indications recently that industry influence is on the decline, not by choice but by virtue of structural exclusion and by strict adherence to regulatory directives or deference to regulators' preference. An example is the Corporate Governance and Human Resources Committee's (CGHRC) proposal to separate the approval process for the compliance elements (VRFs and VSLs) from standard approval process, which appears to be insensitive to industry's overwhelming preference to ballot them together and without any involvement of the MRC. Another example is the development of VRFs for the ATC standards by NERC staff as opposed by the standard drafting team.

68. Comments and recommendations:	
	Response Count
	11
answered question	11
skipped question	131

	Comments and recommendations:
1	Although NERC and the regions staff have come a long way establishing the ERO, major strides still needs to be accomplished to acheive clear reliability standards and compliance.
2	NERC should conduct a survey similar to this one, but allow the responders to remain anonymous. It is very likely that NERC would receive different answers in such a survey.
3	NERC, in it's function as the ERO, is still an immature organization. Careful attention to transparency and consistency, and further refinement of processes, procedures and mission with input from affected stakeholders, are essential as the organization grows into it's role.
4	none
5	None
6	None
7	None
8	Please see previous comments and recommendations.
9	See APPA written comments.
10	The number of initiatives and projects is posing a serious strain on industry resources. Even Exelon, as a large corporation, finds it difficult at times to follow developments at NERC and participate on multiple committees, working groups and standard drafting teams. Exelon suspects that the ability for small to mid-size stakeholders to participate in a meaningful manner must be hampered.
11	There are no comments and/or recommendations at this time.

Principal Recommendations for Improvement

69. Since NERC was certified as the ERO in July 2006, the following are the major improvements seen in NERC and the applicable Regional Entity(ies):

	Response Count
	58
answered question	58
skipped question	84

	Question Answers
1	(1) NERC is moving in the right direction to seek stakeholder input on processes and draft standards, including VSLs and VRFs. (2) NERC is very seriously watching its budget. (3) NERC staff is cordial and friendly.
2	(1) WECC Hiring of Taud Olsen for Compliance Outreach (2) WECC Hiring of Patrick Miller to run CIP Program (3) WECC Web Portal and new Compliance website (4) WECC support of Western Interconnection Compliance Forum (5) WECC outreach continues to be exceptional
3	(applies to NERC & RFC) Communications via email & phone conversations have been helpful. I can usually get a quick answer to a question via email or by calling a contact from RFC or NERC.
4	1. Organization 2. Transparancy 3. More approachable
5	1. WECC implementation of the WebPortal. 2. WECC CIP Users Group.
6	1. Distribution of information via NERC web site and newsletters (NERC) 2. Distribution and sharing of information via newsletters, meetings and WECC web site (WECC)
7	1. Distribution of information via NERC web site and newsletters (NERC) 2. Distribution and sharing of information via newsletters, meetings and WECC web site (WECC)

	Question Answers
8	1. It's all about bulk power system reliability. The singular focus of the ERO should be on maintaining and enhancing the reliability of the bulk power system in North America. Exelon recommends that program areas that do not support this focus will divert resources away from reliability and should be reduced or eliminated. Metrics should be developed and used to assure that this focus and related efforts are measurably successful. Processes should be streamlined so as to best improve reliability for a given amount of effort. This includes employing an appropriate mix of education (the ERO as the "coach") and enforcement (the ERO as the "cop") to achieve the highest levels of compliance. This also includes tailoring an appropriate level of compliance/enforcement efforts to "misdemeanors" differently from the efforts applied to "felonies" that have a bigger impact on reliability. 2. Self Regulatory Model (SRM). The bulk power system in North America is of a scale and level of complexity such that there is no one company, stakeholder group, or government agency that is (or could be) capable of being the technical expert on system reliability. Instead, the ERO concept relies on the SRM approach to use the collective technical and operational wisdom of experienced personnel and companies to develop reliability standards using an ANSI approved process. Exelon recommends that the ERO should actively protect this process to assure that it is fair and transparent and not dominated by any one organization or sector of stakeholders. 3. Clear roles/responsibilities and great execution. The overall success of the ERO model depends on all involved (stakeholders, Regional Entities, NERC, and FERC) having a clear understanding and acceptance of their respective roles and responsibilities and that they each execute their responsibilities effectively. For example, a. The owners/operators/users of the system comply with all applicable requirements. Stakeholders all contribute to the development of technically sound and effective Standards. b. The Regional Entities, under agreements with NERC, are the front line in compliance and enforcement activities, in training, and in resource assessment efforts. c. NERC provides leadership for the Regions and stakeholders, provides technical assistance to the stakeholders, assures fair and transparent operation of the standards development process, provides common tools and oversight of the Regions' compliance and enforcement efforts, reviews/approves enforcement actions of the Regions, and performs various assessments of system reliability. d. FERC is the arbiter of enforcement actions, has jurisdiction over the ERO, etc. It is important that there be a common understanding of the vision for the ERO among stakeholders, NERC and the Regions, and FERC. Overall reliability of the system will ultimately suffer if all involved are not aligned in their efforts.
9	1. NERC - improved website 2. WECC - improved website and web portal for submitting information 3. WECC - hiring Patrick Miller to oversee CIPS related standards 4. WECC - holding CUG meetings and open mic conference calls
10	1. Processes and procedures for performing statutory functions have improved
11	1. The information on the CIP standards and the knowledge base has improved tremendously. 2. NERC and the entities have worked very hard, holding various workshops to improve stakeholder awarenss of compliance activities.
12	1.Streamlining of the audit process including the development of the RSAWs. 2.Development of tools and applications for communication with the industry and the various stakeholders involved. 3.Progress in the entity registration and compliance process including the joint registration process. 4.NERC has developed and submitted to the Commission a total of 95 continent-wide reliability standards that, as of December 31, 2008, have been approved by the Commission. 5.Approval of NERC's Rules of Procedure (ROP) and the Reliability Standards Development Process (RSDP). 6.Establishing a cyber security program and communication alerts protocol for cyber security related alerts. 7.Coordination of reliability standards development and revision activities with the development of business practices by the North American Energy Standards Board (NAESB). 8.Establishing regional delegation agreements (RDA) with all the regional entities.
13	A little better at communications. Could use more improvement.
14	a. RFC has improved the Compliance Portal site b. NERC has established and received approval from FERC for verison 0 and version 1 reliability standards c. NERC created and received approval from FERC for a uniform Compliance Monitoring and Enforcement Program
15	Both NERC and SERC have began to seek ways to reduce their budgets. Software tools for compliance reporting have improved. Processes are becoming more streamlined and more effective.
16	COLLECTION AND DISSEMINATION OF DATA
17	Communication.

	Question Answers
18	Compliance and enforcement programs have been implemented. SPP RE has further developed and implemented its independence from the SPP RTO. The Risk Penalty matrix has been completed but may need further modification based on practical impacts on the documentation violations in accordance with the standards.
19	Cyber Alert process and actual production of consistent advisories.
20	Depth and insight into standards are more structured towards operations.
21	Enforcement of Reliability Standards
22	For RFC, there is continued improvement in the Compliance and Enforcement process and better auditing. RFC has also improved its reliability assessments and management. Additionally, RFC began sponsoring a new users group with the purpose of promoting the sharing of experience and lessons learned between registered entities. They also began communicating regularly with other regions in support of promoting consistency between regions. NERC has done better to facilitate communications between standards drafting teams and FERC staff to increase the likelihood that good standards will be approved.
23	For WECC, an improvement in response time in connection with reliability-related matters. Additionally, the auditors seem to have become more consistent on what they look for to be auditably compliant.
24	Good web based reporting site.
25	Great effort on reliability.
26	I have only been involved with NERC and NPCC for 6 months, the person who previously interacted with these bodies only for a short time before that. NERC and NPCC have made major improvements during my time in the development of cyber security standards.
27	IMEA is not able to adequately comment due to limited resources available to monitor such initiatives. IMEA supports comments submitted by the Transmission Access Policy Study Group (TAPS) and the American Public Power Association (APPA).
28	Much more attention is being paid to standards and compliance.
29	NERC 1. Streamlining of the audit process including the development of the RSAWs 2. Development of tools and applications for communication with the industry and the various stakeholders involved 3. Progress in the entity registration and compliance process including the joint registration process 4. NERC has developed and submitted to the Commission a total of 95 continent-wide reliability standards that, as of December 31, 2008, have been approved by the Commission. 5. Approval of NERC's Rules of Procedure (ROP) and the Reliability Standards Development Process (RSDP) 6. Establishing a cyber security program and communication alerts protocol for cyber security related alerts. 7. Coordination of reliability standards development and revision activities with the development of business practices by the North American Energy Standards Board (NAESB). 8. Establishing regional delegation agreements (RDA) with all the regional entities. NPCC 1. Streamlining of audit processes and the development of the compliance database "CDAA" application 2. Regional compliance workshops held periodically which provide an insight into standards and compliance related matters 3. Development of NPCC's regional reliability standards development procedure
30	NERC acheived transparency, balanced representation on its board and major committees and has effectively institued mandatory standards. TAPS has addressed this questionaire as the organization reporesenting most TDUs but since it owns and operates no facilities, its comments are limited. Comments by individual TAPS members will be more comprehensive.
31	NERC and the Regions, together with stakeholders and FERC, should be congratulated on the significant progress made to date in starting up this effort.
32	NERC and the WECC have developed mandatory reliability standards for the North American grid, and has worked with entities in the US and Canada to implement those standards. NERC has gained recognition as the ERO in several jurisdictions in Canada. NERC and the regions have implemented detailed delegation agreements. NERC has established a cyber security program. The WECC has worked effectively as a cross-border regional entity, and has signed an Operating Agreement with the Alberta Electric System Operator that establishes the framework for their collaboration in establishing consistent standards and processes for their ongoing business relationship.

	Question Answers
33	NERC as the ERO was created in an atmosphere of crisis. After the blackout in August 2003, there was tremendous pressure to fix what was widely perceived by policymakers, if not by the electric utility industry itself, as a broken and unreliable electric gird. Since NERC was certified as the ERO, it has • implemented a successful governance model in the independent Board of Trustees and stakeholder-driven Member Representatives Committee • established delegation agreements with the Regional Entities • received FERC approval for an initial, if imperfect, set of reliability standards that are legally enforceable in the United States • made significant progress in reaching agreement with the Canadian provinces to recognize the NERC standards in some fashion • put in place procedures for the development and approval of reliability standards and for compliance and enforcement • implemented improvements to the quality and consistency of reliability assessments • continued the pre ERO events analysis program and has worked to improve the rigor of the analyses • enhanced efforts to protect critical assets from physical and cyber security threats • provided organizational and operator certification, including a continuing education program to enhance operator certification • begun a benchmarking program to measure the effectiveness of efforts to improve bulk power system reliability.
34	NERC has improved its communication and notification about development of Standards and revisions to Standards. WECC has implemented an improved Compliance Website and Portal for the organization of compliance submittals, mitigation plans, etc.
35	no comment
36	No Comments
37	No opinion.
38	None
39	Openness and responsiveness are improving. The regions are becoming better at providing help in documentation.
40	Openness and transparency appear to be the major improvements.
41	Outreach programs have improved and provide valuable opportunities for registered entities to obtain information regarding the CMEP, status of new and revised standards and summarizations of types of violations.
42	Overall, I have witnessed our system get better (become more reliable) as a result of the requirements of the developed standards. NERC and SPP have played an instrumental role with the development and implementation of the standards program for our region. As I have stated before, SPP worked closely with CWL as we developed and implemented our program to ensure compliance with applicable standards.
43	RELIABILITY STANDARDS, AUDITS PROCESS, OPERATORS CEH's REPORTING AND TRACKING.
44	See APPA written comments on Standards and Compliance
45	See previous question responses
46	SPP is a party to the IRC Standards Review Comments, please refer to that submittal for our response to this question.
47	The effort to move from policies to standards has been largely successful. WECC has been instrumental in getting systems operations training going and NERC CEH program is successful.
48	The movement to standardize as much as possible across the Regional Entities is a major benefit to multi-region registered entities. The "ultimate solution" described on Page 60 of the Preliminary Self Assessment that would enable a Registered Entity with operations in multiple Regions to be assigned to a single Regional Entity would be a huge benefit.
49	The MRO was structured along the draft U.S. legislation before the ERO was certified and was already in operation by the time that legislation was passed. The MRO has continued to evolve and to improve incrementally. No major improvements are noted. At NERC the implementation of the MRC to replace the stakeholders committee and the continuing dialogue with the Board of Trustees in various forums and forms is a major improvement.
50	The NERC Alert process
51	The Reliability Standards have been shortened and clarified.
52	The standards were er-written to make sure that the measures are clear and bidings. more standards were written to cover wide reange to elements that are important to the grid reliability. The issue of independence and how the subregions are financed were established.

	Question Answers
53	There has been an increase in the number of staff and their visibility. NERC has solidified many of it's processes and is actively and aggressively working to improve the standards.
54	There seems to be an effort toward organization, especially on the TRE side. But I think that NERC and TRE are a long way from understanding the day to day operation of the utility industry they pretend to regulate.
55	We do not have enough experience with NERC or SPP to comment.
56	Web Portal WECC Small Utility MOU
57	Web site and communications
58	Workshops improved

70. The following are principal recommendations for continuing improvement (please number each distinct recommendation and indicate whether it applies to NERC or one or more Regional Entities:

	Response Count
	74
answered question	74
skipped question	68

	Question Answers
1	(1) NERC and WECC need to provide more training and education regarding compliance with the standards. (2) NERC needs to expedite interpretations that could have a major impact on registered entities. (3) NERC needs to clearly interpret standards rather than leaving interpretation to the regional entities. (4) NERC or WECC need to find a vehicle to provide examples of excellence.
2	1) Develop guides for interpreting standards.
3	1) NERC and WECC should ensure that smaller registered entities are not continually disadvantaged in their abilities and opportunities to effectively demonstrate a culture of compliance. 2) NERC and WECC should place more emphasis on performing to the requirements of the reliability standards and less emphasis on documentation that demonstrates compliance. 3) NERC and WECC should address the unnecessary redundancies that currently exist on the NERC compliance registry. Requiring entities to identify which facilities correspond to their functional registrations may be part of the solution. If joint registration is meant to prevent overlapping registrations, then NERC and WECC should better convey its usefulness.
4	1) NERC should improve/modify the VSL matrix 2) NERC should permanently leave the readiness evaluation program inactive and provide these types of checkup's through spot checks
5	1)WECC- improve timeliness of its Compliance Program 2)WECC- find ways to include more smaller entities in the proces and give adequate weight to their needs vs. the large IOUs and RTOs
6	1. As mentioned under the CMEP portion, the current 3 year audit cycle of trying to audit a large collection of standards, should be replaced more frequent, and more targeted audits. 2. Compliance should be less focused on paper evidence and more focused on process, best practices and the intent of the standards. For example under vegetation management a focus on proper paperwork is important, but is no substitute for actually inspecting right of ways. Compliance audits should also highlight and share best practices. 3. NERC and FERC should establish clear rules and expectations for drafting teams for situations where the best technical requirement, and the contents of a FERC order, do not agree.

	Question Answers
7	1. Key terms in reliability standards must be very clearly defined, or even application of standards is impossible. 2. Regional reliability entities must be brought into something resembling conformance with the continent-wide standards. The point of putting NERC in charge of reliability was to have an evenly applied set of standard whether in California, Alberta, Virginia, Florida, or Texas, not to have independent kingdoms imposing their wills on the entities within their regions.
8	1. More timely processing of violations (especially WECC and NERC). 2. Address GO/GOP/TO/TOP Interface issue on registration and applicable Standards (WECC and NERC).
9	1. NERC should move to a "traffic tricket" concept for low risk/low severity level violations. The NRC uses a process that results in "non-cited" violations. This would greatly reduce the administrative burden of processing low-level violations. 2. NERC should form a committee of stakeholder executives to funciton in an advisory/oversight role, similar to the nuclear model. This has multiple benefits. It gives the executives the opportunity to provide input to the process and gives them first hand knowledge of the process. 3. NERC should make the same training available to Registered Entities as it requires for the Regional Entity auditors. Registered Entities can bear the cost of this training. Coupling audit training with training of evidence required to demostrate compliance to each standard would standardize "knowledge" across all Registered Entities on what is needed to successfully navigate an audit. This knowledge would be used to better prepare for the audits. The improved process of preparing for the audits would manifest in better record keeping at the point of the transaction and better planning to do what is required to remain compliant to the standards in real time. The bottom line is that reliability would be enhanced. Creating a strong culture of compliance requires the application of knowledge to do those things necessary that foster compliance. This requires knowledge and accountability. Line leadership provides the accountability. NERC can and should help to expand the knowledge base.
10	1. NERC: There is a need to better define which reliability standards/requirements really need to apply to small entities (e.g., small DP, small LSE, small TO, etc.) for protecting the reliability of the BPS. A good example is the WECC "LSE/DP MOU on Compliance". A similar iniative is needed continent-wide, and needs to include the TO and TOP functions at a minimum. 2. NERC, RFC, SERC: Large entities appear to have an undue influence in the voting process for proposed reliability standards. 3. NERC, RFC, SERC: IMEA is currently tracking over 40 proposed reliability standards initiatives impacting one or more of our registered functions. This is significantly impacting our reliability compliance resources. A moratorium needs to be declared on all but the most critical standards developments needed for the protection of the reliability of the BPS. 4, NERC: There is a need to focus existing resources on the development of Guidelines for compliance with existing reliability standards. 5. NERC: There is a need to direct Regional Entities to not expand the NERC Compliance Registry Criteria through the Applicability Section of a proposed region-specific reliability standard.
11	1. NERC: Make the Penalty Calculator transparent. 2. NERC and WECC: Provide more consistency across the Regions with respect to compliance, enforcement, violations, penalties, etc. 3. NERC and WECC: Define what constitutes acceptable documentation of an entity's compliance with each portion of all requirements. We are in support of the Regional Managers' effort to provide examples of acceptable documentation through http://www.regionalentities.com/. 4. NERC: Needs to create a streamlined process for resolution of requests for interpretation. 5. NERC and WECC: Provide forum for Auditor Training for Registered Entity Internal Compliance Program staff (per NERC Compliance Program Audit Worksheet); note that WECC has already begun exploring this issue.
12	1. NERCand the Regions have created a workload that threatens to strangle all of us. NERC needs to reduce the number of mandatory standards and develop a "parking ticket" appraoch to enforcement and penalties. 2.it needs to change its culture so that instead of seeking ever more entities to regulate, it refocues on those entites that can truly impact the reliability of the bulk power syste, Avoiding cascading outages is what this was all about. 3. it needs to refocus the standard draftiing teams to not seek to bering in new entites unless there is compelling evidence that not doing so will adveresly impact reliability and require an outreach if that determination is reached. 4. it needs to reduce the backlog of outstanding alleged violations, etc and institue a random audit approach when violations are self reported instead of auditing evry entity that self reports. it needs to recognize that the sheer volume of work that has been created is actually working against reliability by diverting resources from performing operations to making out paperwork
13	1. See response to Section 4 Question 2. 2. NERC needs to insure that audits are conducted in a consistent manner across Regions. NERC needs to establish a leadership role over the Regions as the ERO. This will result in consistency across Regions in enforcement and audits.

	Question Answers
14	1. Simplify the standards process. 2. Eliminate unnecessary standards or requirements which would not pass a cost/benefit test.
15	1. There are 1,269 Requirements in the Reliability Standards and growing with each new or modified Standard. We believe a more appropriate number would be no more than 10 Standards and 200 Requirements. 2. NERC's Board Compliance Committee in conjunction with Staff and Regional Entities should define baseline penalties for non-compliances with standards along with consideration for increasing or decreasing penalties. 3. Threshold criteria for event analysis by FERC, NERC, or a region needs to be clearly defined.
16	1. This on line survey should be in a MS word format, too. The SDT places its comment form in an online survey (like this) and in word form. This allows companies to work the survey prior to the submission date.
17	1. All Regions: Continue to clarify you regions documentation and all of you should combine your documentation into a industry standard. There is too many forms with too many different sets of directions. 2. NERC should make clear to its participants when new or changed Reliability Standards have been approved by FERC.
18	1. CLARITY ON STANDARDS AND APPLICABILITY (NERC/NPCC) 2. IT...CERT STATEMENTS AND SIGN OFFS (NPCC)
19	1. Continue improving event analysis. 2. Provide a means to view causes and timelines for regional events so understanding can take place which can improve mitigation plans. This can take place within a secure access area to minimize potential cyber threats and system weakness.
20	1. Continued involvement with WECC and the members of the Western Interconnect, during CUG meetings, etc. 2. More objectivity in audits. 3. Need to really look at standards for redundancy and consider cross referencing a standard to all other standards it may depend upon, duplicate or add to (i.e. IRO and TOP standards and the PER and EOP standards).
21	1. Create a group within WECC/NERC to provide audit raining and examples of good documentation to the utility industry for assuring certifiable compliance with the standards. 2. NERC should create clear standards and examples of good compliance documentation so that the industry will know how to comply, especially those with operations in multiple regions. 3. NERC should publish the Penalty Calculator so industry can know what to expect and can comply with its fiduciary duties in disclosing items with material impact. 4. NERC/WECC Standards should include applicability by requirement and sub-requirement to provide better clarity to registered entities as to their responsibilities for compliance.
22	1. KNOW WHAT SIZE COMPANY YOU ARE DEALING WITH SINCE ONE COOKIE CUTTER APPROACH DOES NOT WORK WHEN IT COMES TO ENFORCEMENT (NERC)
23	1. Make sure the reporting systems are user-friendly, they are not.
24	1. NERC - hold training sessions on how to comply with each of the standards and focus less on sanctions 2, WECC - hold more trainings sessions on how to comply with each of the standards 3. WECC - improve turn around time on review when items like self certification, spot check information and mitigation plans are submitted 4. WECC - respond to inquiries that are made by phone and email. I have made inquiries and never heard back from anyone at WECC. 5. WECC - based on the number of violations in the WECC region compared to the other regions, WECC is clearly not in sync with the compliance program. WECC needs to modify its compliance program to get in sync with the other 7 regions. 6. WECC - regarding WECC's relay maintenance white paper issued in late 2008, WECC should get an approved interpretation before it imposes the requirements based on its "professional judgement"
25	1. NERC and NPCC could do more to consider the added beneift of enhanced reliability versus the cost of achieving it. 2. NERC and NPCC websites are less than optimal as far as ease of use, and sometimes finding information is more difficult and time consuming than necessary.

	Question Answers
26	1. NERC should have "opt-in" distribution lists readily available (and easy to find) on its website. 2. NERC should allow entities to develop their own process for handling NERC alerts and to designate alternate contacts to receive acknowledgement links, in addition to the primary contact. 3. RFC should send RFC information and not "forward" NERC emails. We already receive a large number of emails from both sources, (no need to add redundancy). 4. RFC should have established a streamlined compliance communication and requirement process, so that all departments within RFC follow the same process. 5. RFC should conduct workshops on new standards that are being proposed. Suggest quarterly workshops. 6. RFC should make its ballot pool registration status available on its RSVP website.
27	1. Quit trying to write specific regulations for all regions. It just doesn't work. Write general and generic Reliability Standards for the national power grid, but allow the local region to interpret those standards according to the electric industry of the area. The local Region is better suited to determine the specifics within that region. NERC and TRE. 2. Provide training opportunities, resident or non-resident. NERC and TRE. 3. Allow some amnesty to ask questions. We are all trying to learn this thing and we are all supposedly working toward the same goal. Even the state utility commission will let you come in and get an opinion without consequence. Disallowing amnesty sets up and "us vs. them" atmosphere. TRE. 4. The NERC registrations don't fit all regional models. Quit trying to nationalize the market by playing with market standards. It DOES NOT relate to reliability. the NERC classifiactions need have the flexibility of local interpretation. NERC 5. Quit trying to penalize the country for the mistakes of a few. If a utility intentionally screw up and jepoardizes the reliability of the grid - go after them. The rest of us are simply trying to deliver power at the cheapest cost. Your "Reliability Standards" are simply adding cost and distracting utility employees from the efficient operawtion of their business. Maybe I'm wrong, but if there's a case study out there that shows utility regulation improves value (quality more than cost), I would love to see it. NERC.
28	1. Resolve Registration Issues. 2. Resolve backlog of alleged violations, this is a NERC and Regional Entity issue.
29	1. Standards should be developed and more focuses on the risk to the Bulk Electric System. The regulatory regime/process should emphasize a risked-based approach. 2. Achieve greater consistency between the Regional Entities (Compliance Program) 3. Achieve greater role clarity between NERC and the Regional Entities (The Delegation Agreement should be the source of this clarity and future modifications) 4. Reassess the value of the Violations Severity Levels. Refocus the sanctions and penalties formula to use risk as the penalty determinate. 5. During the 3-year standards improvement program, eliminate administrative requirements which add little to the continued reliability of the Bulk Electric System. 6. Current Regulatory uncertainties are contributing to industry inefficiencies, therefore, focus should be on creating / obtaining a clear, stable and predictable set of requirements as quickly as possible. 7. Reassess the role and charter of each committee and sub-committee at NERC and the Regional Entities. How do they align with NERC overall vision? How does the committee / sub-committee support NERC's vision? What is the benefit of the committee / sub-committee? 8. NERC should work with the regions to develop a coordinate compliance schedule.
30	1. Unambiguous interpretation of Reliability Standards and Requirements (NERC & WECC)
31	1. Unambiguous interpretation of Reliability Standards and Requirements (NERC & WECC)
32	1. WECC: Improve timeliness in committed processing of CMEP provisions. Chronic tardiness is negatively impacting the entities, causing rampant confusion and frustration. 2. WECC: When conducting audit activities, adhere to the text of the subject Requirements; do not add any additional interpretation or expand the scope of the Requirements themselves. The Registered Entities are bound by the text of the Requirements, and this is scope to which the audit must be limited. 3. WECC: Ensure consistency of audit findings and audit approaches within the Region and with the other Regions. Several instances have occurred where two or more entities providing identical compliance evidence are treated in a vastly dissimilar fashion. 4. NERC: Improve the process for official interpretation of Requirements of the Standards. Proper and timely interpretation on the front end saves valuable time and resources of the Auditors and the entities subject to Audit, as well as enhancing reliability.

	Question Answers
33	1. NERC must focus standards development on the most important standards, in place of volume were focus is lost on quality. (national and regional) 2. Staff is timely and responsive in meeting the needs of reliability stakeholders and addressing issues affecting the reliability of the bulk power system. 3. Staff effectively communicates a vision and expectations and provides effective leadership to achieve that vision. 4. Organization is open and transparent in the conduct of its statutory functions. 5. Organization and staff are sufficiently independent of owners, operators, and users to effectively perform statutory duties with objectivity and integrity.
34	1. Redouble efforts to focus on standards, entities and facilities that truly have a material impact on the reliability of the bulk power system. There is a natural tendency to try to introduce more standards and bring more entities and facilities into the arena of mandatory compliance. Sometimes this is done in the name of “equity” or “fairness.” Sometimes it is done as the result of pressure from FERC. However, the creation of more standards or more detailed standards and requirements as well as the inclusion of ever smaller entities and facilities is more likely to result in degraded rather than improved reliability as necessarily limited resources are diverted from more important to less important entities, facilities and requirements. 2. In part to implement Item 1, find a way to quickly eliminate standards that should probably never have become standards. There are many “requirements” in current standards that should instead be guidelines, best practices, or something similar. The industry is wasting valuable time that should be spent on planning, operating and maintaining a reliable grid on creating and maintaining paperwork instead. 3. Clean up the remaining standards so that they clearly delineate who is responsible for what, and when. 4. Do not develop any new standards until Items 2 and 3 are completed. 5. Discourage the creation of regional standards. 6. Redouble efforts to clear the backlog of violations as quickly as possible. The credibility of NERC and the REs depends on a quick resolution of this issue.
35	1.) The frequency in receiving newsletters or lessons learned from past year's assessments or audits could increase. 2.) The Iowa utilities meet at least twice a year to discuss specific concerns regarding complying to the CIPs. These meeting are attended by the MRO but seems the representative is on the same learning curve as the utility members.
36	1.NERC and the various REs need to streamline the standard development process. 2. Expand the on-line training to all market participants (NERC and RE specific) 3. Continue promoting training.
37	1.NERC’s primary focus should be reliability which should be pursued using the self regulatory model approach. 2. NERC should lead programs to achieve consistency among regional approaches to CMEP.
38	1.There should be a dedicated effort to clean up the standards and remove explanatory text labeled as requirements or sub-requirements. NERC staff should initiate SARs to address this issue as soon as possible. This will also help expedite the development of appropriate VRFs and VSLs. 2.NERC should identify in its plan a breakdown of standards work and expenditures due to; a) industry driven standards and b) Regulatory driven standards and rework. 3.In its work plans, NERC should also provide sufficient buffer period for unanticipated regulatory rulings and mitigation plans in the event certain high priority standards do not get completed according to its work plans. 4.NERC should develop a companion database to the standards that link the requirements, measures, and RSAW information. 5.NERC should ensure that audits do not end up becoming mere exercises in documentation. 6.Regional entities have to retain audit information on the audits performed on entities. NERC should ensure confidentiality of the information submitted to the regional entities during audits. 7.NERC and the regional entities must ensure confidentiality of information and appropriate reporting mechanisms during cross-border CVIs due to different jurisdictional authorities. 8.NERC should produce 3 year plans which take into consideration (a) priorities for the future (b) mitigation plans in the event that such high priority projects are not completed in time, and (c) sufficient time buffer for regulatory interventions in to the standards process. 9.NERC should prioritize violations during the processing of these compliance violations. This would help avoid the huge backlog of CVIs which now exists. 10.NERC needs to develop a vision and a strategy as to how it plans to be an international ERO working without deference to any particular regulatory authority. 11.NERC should establish an outreach program to better manage stakeholder and industry communications and expectations. 12.NERC should review its internal data collection and validation processes to fortify its current data analysis system by designing, creating, testing and putting in place additional automated data checking systems to accommodate the increasing amount of data NERC collects for its reliability assessments.

	Question Answers
39	a. The Penalty / Sanction process is seriously flawed. A review of processed penalties provides no guidance, but rather confusion over how penalties are assessed (NERC and RFC) b. The length of time required to process compliance violations is too long (RFC) c. FERC, NERC, and Regions must clarify their roles for the registered entities. As time passes, the roles and responsibilities for standard development and compliance enforcement is unclear. d. NERC and the regions must begin to clearly define expectations. Presently RFC will not provide constructive guidelines or best practices for registered entity reliability standard compliance plans. e. NERC must address the problems with the Functional Model and the Compliance Registry. f. Ensure that standards are applicable to the proper entities. It seems that NERC (maybe as a first shot) made many standards applicable to entities that no means of possibly meeting the standard. The most notable is the profound confusion of the LSE function with the Distribution Provider function. The NERC glossary says that a Load Serving Entity Secures energy and transmission service (and related Interconnected Operations Services) to serve the electrical demand and energy requirements of its end-use customers. Functionally, an LSE does not own any transmission assets and is in essence a contract writer. Yet, they are assigned applicability in numerous standards that in their real role they cannot possible comply.
40	a.) Improve uniformity of assessment to each standard across the regions (WECC in particular) b.) Define the reliability gaps between the standards for GO/GOPs and TO/TOPs, and based upon these findings, redefine the applicable standards appropriately to these entities
41	All of the following apply to NERC: 1. Define reliability. If reliability is "keeping the lights on" then the industry can hardly be improved, and most of the improvement to be had is in distribution. If reliability is preventing large cascading outages then why are there so many standards and so many entities involved? 2. Define bulk power system, bulk electrical system, and what constitutes impact to such. It is debatable as to whether 115kV systems or less than 200MW generators can impact the BES. 3. Concentrate on the basic elements impacting reliable operation of the interconnected system. Reduce the number of standards. Do not approve additional standards. Perhaps start with large entities or entities at 230kV and above. 4. Consider whether the required documentation is of benefit to reliability. The burden of documentation is great. Personnel and resources are being added which in turn will raise rates. 5. Use outage statistics to show the impact of the current standards/compliance system on reliability.
42	Both NERC and SERC need to identify standards and requirements that if violated do not impose a material impact on the BES and place these standards and requirements in a category that if violated a reasonable, postage stamp type of fine should be applied. This single change could increase the settlement through put of more serious violations by several 100%. Such minor violations would include documentation non-compliance that had no direct impact to the BES.
43	Change registration criteria to reduce small entity requirements.
44	Continuing participation and inclusion of industry stakeholders is necessary to ensure appropriate policy formulation, strategic guidance and standards development. NERC has, in some instances, overstepped in authority by applying pressure on standards drafting teams to address FERC directives in new or revised standards, NERC has prepared audit guidance in the form of RSAWs that includes language that implies mandatory compliance with requirements that exceed those identified in the standards themselves. More information is needed related to the types of standards violations that are being identified. The backlog of processing violations is preventing the industry from more completely understanding what they need to do to fully comply with the standards.

	Question Answers
45	FirstEnergy endorses the comments and recommendations submitted by EEI. In addition, FirstEnergy offers the following summary recommendations. Principal Recommendations for Improvement 1) NERC should focus on getting its key reliability standards improved quickly. Moreover, NERC needs to distinguish the standards important directly to reliability of the bulk power system versus standards that are administrative in nature. The standards development process should be overhauled to accomplish this, such that administrative, documentation-type standards that are beneficial, but in and of themselves do not involve an immediate risk to reliability, can be developed differently than key reliability standards. 2) NERC should especially focus on getting its CIP reliability standards improved to make them clearer and avoid the need to develop numerous "guidance documents." In the meantime, NERC should work to ensure fair, consistent and effective compliance enforcement of the current CIP standards. 3) NERC should improve its compliance monitoring and enforcement program and focus it on reliability rather than administrative documentation and evidence. Moreover, NERC needs to distinguish violations of standards important directly to reliability of the bulk power system versus violations of standards that are administrative in nature. The CMEP should be streamlined so that violations of administrative, documentation-type standards can be processed with minimum documented evidence and without lengthy investigations or large penalties and sanctions ... just "non-cited violations" plus mitigation plans. Investigations can be reserved for the most important reliability standards, of whose violation would put the BES in jeopardy. 4) NERC should focus attention on streamlining the VSLs and on transparency for the Penalty Matrix. Firstly, the development of VSLs should not distract from development of other elements of the reliability standards, such as the Requirements. Nor should VSLs be assigned at the sub-Requirement level. Secondly, the VSLs should be designed and work along with the penalty matrix and sanctions guidelines so that they properly deter clear violations of significant standards. 5) NERC should work more closely together and cooperate with the Regional Entities. It is important that NERC and the Regional Entities are developing together the necessary expertise to professionally and consistently audit registered entities and process alleged violations of reliability standards. Thus, violations can be confirmed in a fair and efficient manner. Especially important is that NERC and the Regional Entities understand their respective roles and responsibilities when they are working together on a particular audit, compliance investigation or event analysis. More so, roles and responsibilities among Registered Entities, Regional Entities, NERC and the FERC should be reviewed when the Commission is also involved. 6) NERC should strive to become a strong ERO that embodies the self regulatory model. The collective technical expertise and operational experience of the industry is critical to the efficient and reliable performance of the bulk electric system. Only when NERC itself is strong can its stakeholder-driven processes succeed. With an effective self regulatory organization, the FERC can properly serve in an appellate role. 7) NERC should improve its operation of the Electric Sector – Information Sharing and Analysis Center (ES-ISAC) to ensure that its alerts and advisories are comprehensive and clearly actionable by those in the industry that are impacted. 8) NERC's reliability assessments have been improving, but they must be more relevant, include critical reviews and address important issues, with focus particularly on setting good reliability metrics to better measure long term performance and adequacy of the bulk power system. 9) NERC should establish 1 to 5 year business plans so that its direction is clear, objectives can be pursued, and assessment of its performance can be more targeted and objective in the future. 10) NERC should simplify and resolve its Functional Model so that it is clear and makes sense in that what follows from it, the functional compliance registry criteria and the applicability of the reliability standards, contains no reliability gaps or overlaps. It is especially important that NERC explicitly address the functional entities that form the reliability model within RTOs.

	Question Answers
46	FOCUS ON RELIABILITY (1) AEP would suggest that for self-reported violations that have minimal or no impact on reliability, there should be no fine. Only under repeating situations or high numbers of minimal violations should NERC determine that the compliance culture of the organization is lacking and apply an appropriate fine to facilitate the necessary mitigation. (2) NERC and the REs can advance the focus on reliability by developing and employing performance metrics. This will help facilitate the differences among misdemeanors and the major violations that impact reliability of the BES. COMPLIANCE VIOLATION BACKLOG (3) The "level of performance necessary" should be articulated and not be left to an interpretation from the auditor during the audit audited. (4) The timeliness in completing the compliance violations process needs significant improvement, as the backlog is preventing entities to learn the full benefits of lessons learned and to quickly remedy compliance concerns. (5) SPP and TRE should be moving along with developing NERC standards for the "fill-in-the-blanks" standards. The variable pace across REs pose the risk of deriving significantly different determinations. COMPLIANCE PENALTY CALCULATION TRANSPARENCY (6) From an outside perspective, NERC has a black box method on how to determine the dollar amount of violation. To gain transparency, the industry has asked for the tool, but NERC has declined to make the tool available. Without such knowledge, the existing ranges in the sanction guidelines are very wide and with the "per violation / per day" factor can create levels that could reach a material level threshold for public disclosure in accordance with SEC regulations. This creates a situation of unbounded financial risk risk that was clearly not intended, particularly for lesser administrative type items with minimal impacts on reliability. A tool is necessary to provide this transparency. (7) NERC needs to allay concerns that minor administrative violations are being treated with the same level of scrutiny that more serious violations are being addressed. There is not a positive indication that there will be a reasonable relation to the seriousness of the offense. COMPLIANCE PROCESS TRANSPARENCY (8) The use of the stakeholder process should be consistently applied, without deviation, to fully recognize the benefit from stakeholder input. RSAWs should be developed concurrently to to prevent inconsistencies and scope creep by text developed in an alternative process. This would help maintain the intended scope and functionality as envisioned by the SDT. (9) Unfortunately, some stakeholder processes are being bypassed to increase VRFs and VSLs without the benefit of subject matter expertise being employed to provide technical justification for the changes. (10) The standards process would benefit from creating linkages across the regions. It would be very helpful for all REs to use the same portal. (11) Standards can be improved to not only provide an explicit list of applicable functional entities, but provide clarity regarding which entity is responsible or why the particular entity has been identified and to better define . responsibilities across multiple entities. NERC must work to provide the clarity necessary to avoid these ownership concerns. (12) Standards can be improved to be sure that requirements are actionable and that such actions can be measured. This too will reduce the ambiguity of requirements and to provide solid measures for such requirements. (13) NERC's project management of SDTs needs to be enhanced to better manage the time available to each area of the standard. NERC ADMINISTRATIVE (14) NERC needs to attract and retain industry experts to off-set the declines in has experienced over the last several years. (15) The NERC-led event analysis could be improved by providing more timely resolution. (16) Increase the provision of pre-audit materials to at least one hundred and twenty (120) days to provide adequate time to comprehensively complete the pre-audit information. (17) The latest version of the Reliability Standards Audit Worksheets (RSAWs) could be improved to improve clarity and improve consistency across the process. (18) NERC could improve its training presentations or training documents by matching its results from earlier years.
47	FOR BOTH, KEEP UP THE GOOD WORK!
48	For NERC: * NERC Alerts - 24 hr acknowledgement to critical alerts is irrational. This needs to be adjusted as it cannot be done, especially for small entities. For TRE: * TRE needs to soley look at the NERC Statement on Registration Criteria, and not at ERCOT Market functions when registrering entities for the NERC Compliance Registry. This creates inconsistencies between regions.
49	For WECC, imporve the timeliness of the violation review process and ensuing negotiations.

	Question Answers
50	Given the interconnected nature of the North American transmission grid, it is important that NERC maintain its independence from FERC in the day-to-day activities required to fulfill its role as international ERO. It is important that NERC processes balance the differing needs and concerns in the US and Canada. Presently, FERC yields a heavy hand in the standards development process and changes to the Rules of Procedure. Clearer and more separation between FERC and NERC is needed to ensure that there is no bias towards one jurisdiction versus another. The MRO should consider developing its own expertise to conduct assessments rather than relying solely on MISO to fulfill this function. With respect to the backlog of violations, progress is being made but a sustained and concerted effort to prioritize violations and to process them efficiently needs to remain high on NERC's agenda. The 3-year assessment questionnaire should be developed and tested through one or more focus groups to ensure the highest possibility of consistent interpretations of all questions. All data requests should cite the authority under which the data is being requested (i.e. specific NERC Rule in the ROP).
51	In addition to the workshops, add technical workshops allowing local and regional industrial experts to talk on industry standards issues.
52	In support of the high level recommendations described in the previous survey sections, EEI has some specific suggestions. All of these have been presented to NERC in various settings during the course of the past two years: • Standards development o Completing the 'rights and responsibilities' document o Conducting a comprehensive review of the existing standards catalog to determine the locations of critical gaps and overlaps, and standards and requirements that are not needed to support bulk power system reliability o Improving the efficiency of the standards development process • Compliance and enforcement o Developing a comprehensive management plan for the compliance enforcement program o The plan will include a broad range of critical elements, including an across-the-board improvement in the training and preparation of personnel who perform compliance investigations and audits, and settlement negotiations • Reliability assessments o Developing a set of metrics that support measurement of various indicators of bulk power system reliability
53	It would be useful for NERC to create a NERC "Help Line" to provide a point of contact whereby Registered Entities may seek information regarding compliance questions and/or when seeking clarification of certain CMEP statements, requirements, or provisions. In order to foster Registered Entity inquiries to ask questions, NERC should consider making this Help Line similar to FERC programs that permit entities to openly seek compliance information. Escalation or referral to the existing FERC "Help line" could then be one of the NERC "Help line" options. It also would be helpful for NERC and the Regional Entities to create regional forums for discussion among stakeholders, such as NERC, FERC Regional Entities and Registered Entities to increase awareness of compliance information and any requirements. These could be less formal than a FERC workshop or technical conference.
54	More time for users to implement changes in RSAWs and new standards.
55	NERC 1. Expand use of email alerts to communicate information to stake-holders 2. Expand use of webinars to communicate/train stake-holders 3. Expand representation of tranmission dependent users on committees and in the stakeholder process 4. Keep standards and enforcement efforts focused on entities that have the impact on the BES and do not include those that virtually have no impact. SPP 1. Expand use of email alerts to communicate information to stake-holders 2. Expand use of webinars to communicate/train stake-holders 3. Expand representation of tranmission dependent users on committees and in the stakeholder process

	Question Answers
56	NERC 1. There should be a dedicated effort to clean up the standards and remove explanatory text labeled as requirements or sub-requirements. NERC staff should initiate SARs to address this issue as soon as possible. This will also help expedite the development of appropriate VRFs and VSLs. 2. In its work plans, NERC should also provide sufficient buffer period for unanticipated regulatory rulings and mitigation plans in the event certain high priority standards do not get completed according to its work plans. 3. NERC should develop a companion database to the standards that link the requirements, measures, and RSAW information. 4. NERC should ensure that audits do not end up becoming mere exercises in documentation. 5. NERC should ensure that regional entities put in place effective measures to preserve the confidentiality of the information submitted to them during audits. NERC and the regional entities must ensure confidentiality of information and appropriate reporting mechanisms during cross-border CVIs due to different jurisdictional authorities. 6. NERC should produce 3 year plans which take into consideration (a) priorities for the future (b) mitigation plans in the event that such high priority projects are not completed in time, and (c) sufficient time buffer for regulatory interventions in to the standards process. 7. NERC should prioritize violations during the processing of these compliance violations. This would help avoid the huge backlog of CVIs which now exists. 8. NERC needs to develop a vision and a strategy as to how it plans to be an international ERO working without deference to any particular regulatory authority. 9. NERC should establish an outreach program to better manage stakeholder and industry communications and expectations. 10. NERC should review its internal data collection and validation processes to fortify its current data analysis system by designing, creating, testing and putting in place additional automated data checking systems to accommodate the increasing amount of data NERC collects for its reliability assessments. NPCC 1. NPCC staff needs to be more responsive to compliance and standards requirements issues that entities bring forward 2. NPCC should work towards developing regional reliability standards at an increased pace. 3. NPCC should develop a formal and open process to respond to comments on draft Documents, Directories and regional Standards.
57	NERC - Consistent expectations of the regional entities for compliance. WECC is extreme and off target.
58	NERC and WECC should continue to work with Canadian entities to ensure jurisdictional matters are addressed, including the handling of confidential data. Standards should be developed that can be considered for adoption in Canada as well as the US, with the ongoing strategy of being the international ERO. NERC and the WECC should contain their costs if possible, with reduced percentages of increase in their budgets year over year. With regard to cyber security, NERC should be thoughtful in their approach and capitalize on existing tools and standards prior to developing addtional tools, etc.
59	NERC should facilitate workshops designed to identify industry best practice for each reliability standard; with results promulgated as compliance expectations. The RRO should actively facilitate and provide interregional training efforts, including the use of VPN, and other web-based training to eliminate the need to travel while facilitating maximum participation. Member audits should be performed by personnel not affiliated with the member or member RRO. NERC should define vague reliability standard terms and requirements; and the RRO should do the same at the regional level. NERC must adopt auditor performance standards and train auditors on how to conduct effective audits, including how to properly investigate operations records.
60	NERC, as the ERO, has been vested by Congress with the substantial, critical responsibility for strengthening the reliability of the BPS through development of reliability standards, evaluation and enforcement of entities' compliance with these standards and assessment of the reliability and adequacy of the BPS. NERC needs to refine its focus on this core mission and not allow its attention to be diluted with programs and processes that do not directly support this mission. Note that these comments were coordinated responses provided for both NCR01219 and NCR00761.
61	No comments
	none
	None
	None
	Please help lessen the impact to smaller entities that do not affect the bulk power system. Man power and resources are not readily avaliable to us.
	Please see previous question responses
	Please try to limit the workload impact on the registered entities.

	Question Answers
	R1. (applies to Nerc & RFC) When creating a standard, think about who & how it affects the entity that has to comply to that standard. Keep the standards simple & to the point. Remember the small entities that are listed as DP's & LSE's that are required to comply with standards that are not applicable to them. If the standards are not applicable to an entity, then that entities function title "DP or LSE" should be removed from that standard.
	Recommendation 1 for NERC): Write for your industry Customers. Recommendation 2 for NERC/WECC): Keep it Simple. Recommendation 3 for NERC/WECC): More precise examples to help in understanding.
	SPP is a party to the IRC Standards Review Comments, please refer to that submittal for our response to this question.
	The penalty calculation tool needs to be made public. Those that are subject to the Reliability Standards need to be able to see what factors positively and negatively affect the penalty amounts.
	There are no recommendations at this time.
	To achieve these critically important goals In support of the high level recommends, Exelon has some specific suggestions. All of these have been presented to NERC in various settings during the course of the past two years: · Standards development o Completing the 'rights and responsibilities' document o Conducting a comprehensive review of the existing standards catalog to determine the locations of critical gaps and overlaps, and standards and requirements that are not needed to support bulk power system reliability o Improving the efficiency of the standards development process · Compliance and enforcement o Developing a standardized comprehensive management plan for the compliance enforcement program o The plan will include a broad range of critical elements, including an across-the-board improvement in the training and preparation of personnel who perform compliance investigations and audits, and settlement negotiations · Reliability assessments o Developing a set of metrics that support measurement of various indicators of bulk power system reliability
	We fully support EEI's comments, copied here: 1. It's all about bulk power system reliability. The singular focus of the ERO should be on maintaining and enhancing the reliability of the bulk power system in North America. EEI recommends that program areas that do not support this focus will divert resources away from reliability and should be reduced or eliminated. Metrics should be developed and used to assure that this focus and related efforts are measurably successful. Processes should be streamlined so as to best improve reliability for a given amount of effort. This includes employing an appropriate mix of education (the ERO as the "coach") and enforcement (the ERO as the "cop") to achieve the highest levels of compliance. This also includes tailoring an appropriate level of compliance/enforcement efforts to "misdemeanors" differently from the efforts applied to "felonies" that have a bigger impact on reliability. 2. Self Regulatory Model (SRM). The bulk power system in North America is of a scale and level of complexity such that there is no one company, stakeholder group, or government agency that is (or could be) capable of being the technical expert on system reliability. Instead, the ERO concept relies on the SRM approach to use the collective technical and operational wisdom of experienced personnel and companies to develop reliability standards using an ANSI approved process. EEI recommends that the ERO should actively protect this process to assure that it is fair and transparent and not dominated by any one organization or sector of stakeholders. 3. Clear roles/responsibilities and great execution. The overall success of the ERO model depends on all involved (stakeholders, Regional Entities, NERC, and FERC) having a clear understanding and acceptance of their respective roles and responsibilities and that they each execute their responsibilities effectively. For example, a. The owners/operators/users of the system comply with all applicable requirements. Stakeholders all contribute to the development of technically sound and effective Standards. b. The Regional Entities, under agreements with NERC, are the front line in compliance and enforcement activities, in training, and in resource assessment efforts. c. NERC provides leadership for the Regions and stakeholders, provides technical assistance to the stakeholders, assures fair and transparent operation of the standards development process, provides common tools and oversight of the Regions' compliance and enforcement efforts, reviews/approves enforcement actions of the Regions, and performs various assessments of system reliability. d. FERC is the arbiter of enforcement actions, has jurisdiction over the ERO, etc. It is important that there be a common understanding of the vision for the ERO among stakeholders, NERC and the Regions, and FERC. Overall reliability of the system will ultimately suffer if all involved are not aligned in their efforts. To achieve these critically important goals In support of the high level recommends, EEI has some specific suggestions. All of these have been presented to NERC in various settings during the course of the past two years: • Standards development o Completing the 'rights and responsibilities' document o Conducting a comprehensive review of the existing standards catalog to determine the locations of

	Question Answers
	critical gaps and overlaps, and standards and requirements that are not needed to support bulk power system reliability o Improving the efficiency of the standards development process • Compliance and enforcement o Developing a comprehensive management plan for the compliance enforcement program o The plan will include a broad range of critical elements, including an across-the-board improvement in the training and preparation of personnel who perform compliance investigations and audits, and settlement negotiations • Reliability assessments o Developing a set of metrics that support measurement of various indicators of bulk power system reliability