

**Reliability Standard Audit Worksheet[[1]](#footnote-1)**

EOP-004-2 – Event Reporting

***This section must be completed by the Compliance Enforcement Authority.***

**Registered Entity:**

**NCR Number:**

**Applicable Function(s):** RC, BA, TO, TOP, GO, GOP, DP

 **Compliance Assessment Date:**

**Compliance Monitoring Method:**

**Names of Auditors:**

# **Subject Matter Experts**

Identify Subject Matter Expert(s) responsible for this Reliability Standard. (Insert additional rows if necessary)

**Registered Entity Response (Required):**

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| --- | --- | --- | --- |
| **SME Name** | **Title** | **Organization** | **Requirement(s)** |
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# **R1 Supporting Evidence and Documentation**

**R1.** Each Responsible Entity shall have an event reporting Operating Plan in accordance with EOP-004-2 Attachment 1 that includes the protocol(s) for reporting to the Electric Reliability Organization and other organizations (e.g., the Regional Entity, company personnel, the Responsible Entity’s Reliability Coordinator, law enforcement, or governmental authority). *[Violation Risk Factor: Lower] [Time Horizon: Operations Planning]*

**M1.** Each Responsible Entity will have a dated event reporting Operating Plan that includes, but is not limited to the protocol(s) and each organization identified to receive an event report for event types specified in EOP-004-2 Attachment 1 and in accordance with the entity responsible for reporting.

**Responsible Entity Response (Required):**

Describe, in narrative form, how you meet compliance with this Requirement.

**Responsible Entity Evidence (Required):**

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| --- |
| Provide the following for all evidence submitted (Insert additional rows if necessary): File Name, File Extension, Document Title, Revision, Date, Page(s), Section(s), Section Title(s), Description |
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**Audit Team Evidence Reviewed** **(This section must be completed by the Compliance Enforcement Authority):**

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**Compliance Assessment Approach Specific to EOP-004-2, R1**

***This section must be completed by the Compliance Enforcement Authority***

Review the evidence to verify the Responsible Entity has the following:

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|  | Evidence of an event reporting Operating Plan |
|  | Evidence that the Operating Plan includes, but is not limited to, the protocol(s) and each organization identified to receive an event report for event types specified in EOP-004-2 Attachment 1.*Event Types (See Column "Entity with Reporting Responsibility in EOP-004-2 Attachment 1")** Damage or destruction of a BES Facility
* Physical threats to a BES Facility
* Physical threats to a BES control center
* BES Emergency requiring public appeal for load reduction
* BES Emergency requiring system-wide voltage reduction
* BES Emergency requiring manual firm load shedding
* BES Emergency resulting in automatic firm load shedding
* Voltage deviation on a Facility
* IROL Violation (all Interconnections) or SOL Violation for Major WECC Transfer Paths (WECC only)
* Loss of firm load
* System separation (islanding)
* Generation loss
* Complete loss of off-site power to a nuclear generating plant (grid supply)
* Transmission loss
* Unplanned BES control center evacuation
* Complete loss of voice communication capability
* Complete loss of monitoring capability
 |
| **Note to Auditor:** Review the additional information section on page 7 of this RSAW regarding EOP-004-2 Guideline and Technical Basis for Distribution Provider applicability discussion and rationale for R1 regarding example types of evidence to review for compliance. |

**Auditor Notes:**

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# **R2 Supporting Evidence and Documentation**

**R2.** Each Responsible Entity shall report events per their Operating Plan within 24 hours of recognition of meeting an event type threshold for reporting or by the end of the next business day if the event occurs on a weekend (which is recognized to be 4 PM local time on Friday to 8 AM Monday local time). *[Violation Risk Factor: Medium] [Time Horizon: Operations Assessment]*

**M2.** Each Responsible Entity will have as evidence of reporting an event, copy of the completed EOP-004-2 Attachment 2 form or a DOE-OE-417 form; and evidence of submittal (e.g., operator log or other operating documentation, voice recording, electronic mail message, or confirmation of facsimile) demonstrating the event report was submitted within 24 hours of recognition of meeting the threshold for reporting or by the end of the next business day if the event occurs on a weekend (which is recognized to be 4 PM local time on Friday to 8 AM Monday local time).

**Responsible Entity Response (Required)**

**Question:** Has the Responsible Entity had a reportable event, as described in EOP-004-2 Attachment 1, during the audit period? 🞏 Yes 🞏 No

If yes, list the event(s) with the date and time of the event and the date and time the event was reported.

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| --- | --- | --- |
| Date and Time of Event | Event Description | Date and Time Event Reported |
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**Responsible Entity Response (Required):**

Describe, in narrative form, how you meet compliance with this Requirement.

**Responsible Entity Evidence (Required):**

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| --- |
| Provide the following for all evidence submitted (Insert additional rows if necessary): File Name, File Extension, Document Title, Revision, Date, Page(s), Section(s), Section Title(s), Description |
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**Audit Team Evidence Reviewed** **(This section must be completed by the Compliance Enforcement Authority):**

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**Compliance Assessment Approach Specific to EOP-004-2, R2**

***This section must be completed by the Compliance Enforcement Authority***

Review the evidence to verify the Responsible Entity has the following:

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|  | Responded to the Applicability Question and provided evidence of compliance if the response was ‘yes.’ |
|  | Evidence of reporting an event (copy of the completed EOP-004-2 Attachment 2 form or a DOE-OE-417 form)  |
|  | Evidence of submittal of event reporting documentation within the time frame of R2. |
| **Note to Auditor:** Under certain adverse conditions (e.g. severe weather, multiple events) it may not be possible to report the damage caused by an event and issue a written Event Report within the timing in the standard. In such cases, the affected Responsible Entity shall notify parties per Requirement R2 and provide as much information as is available at the time of the notification.  |

**Auditor Notes:**

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# **R3 Supporting Evidence and Documentation**

**R3.** Each Responsible Entity shall validate all contact information contained in the Operating Plan pursuant to Requirement R1 each calendar year. *[Violation Risk Factor: Medium] [Time Horizon: Operations Planning]*

**M3.** Each Responsible Entity will have dated records to show that it validated all contact information contained in the Operating Plan each calendar year. Such evidence may include, but are not limited to, dated voice recordings and operating logs or other communication documentation.

**Responsible Entity Response (Required):**

Describe, in narrative form, how you meet compliance with this Requirement.

**Responsible Entity Evidence (Required):**

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| --- |
| Provide the following for all evidence submitted (Insert additional rows if necessary): File Name, File Extension, Document Title, Revision, Date, Page(s), Section(s), Section Title(s), Description |
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**Audit Team Evidence Reviewed** **(This section must be completed by the Compliance Enforcement Authority):**

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**Compliance Assessment Approach Specific to EOP-004-2, R3**

***This section must be completed by the Compliance Enforcement Authority***

Review the evidence to verify the Responsible Entity has the following:

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|  | Evidence that all contact information contained in the Operating Plan pursuant to Requirement R1 was validated each calendar year. |
| **Note to Auditor:** Review the Additional Information section, Rationale for R3 as stated in the Reliability Standard regarding when an entity experiences an actual event, communication evidence from the event may be used to show compliance with the validation requirement for the specific contacts used for the event. |

**Auditor Notes:**

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# **Compliance Finding Summary**

***This section must be completed by the Compliance Enforcement Authority***

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| --- | --- | --- | --- | --- | --- |
| **Req.** | **NF** | **PV** | **OEA** | **NA** | **Statement** |
| **1** |  |  |  |  |  |
| **2** |  |  |  |  |  |
| **3** |  |  |  |  |  |

# **Additional Information Regarding Guidelines, Technical Basis and Rationale from the Standard Drafting Team:**

# **Standard EOP-004-2 — Event Reporting**



**Regulatory Language**

Order Approving Reliability Standard 143 FERC ¶ 61,252 (2013)

P 1. On December 31, 2012, as amended on January 4, 2013, the North American Electric Reliability Corporation (NERC) submitted a petition for approval of Reliability Standard EOP-004-2 – Event Reporting. Reliability Standard EOP-004-2 identifies types of reportable events and thresholds for reporting, requires responsible entities to have an operating plan for reporting applicable events to NERC and other entities (including law enforcement), and requires reporting of threshold events within a 24 hour period. NERC requests that Reliability Standard EOP-004-2 become effective the first day of the first calendar quarter beginning six months following the effective date of a final order in this proceeding, and that it replace currently-effective Reliability Standards EOP-004-1 – Disturbance Reporting and CIP-001-2a – Sabotage Reporting.

P 16. The Commission approved NERC’s proposed implementation plan for the revised standard, including the retirement of existing Reliability Standards EOP-004-1 and CIP-001-2a when EOP-004-2 becomes effective.

P 17. We find that EOP-004-2 enhances the reliability of the Bulk-Power System by requiring timely reporting of specific system disturbance or sabotage events, allowing for both a real-time operational benefit for near-term mitigation of the event, as well as a prospective benefit through subsequent analysis and investigation, including dissemination of lessons learned from the event. We conclude that EOP-004-2 represents an improvement over the currently-effective Reliability Standards, CIP-001-2a and EOP-004-1, in that it provides a comprehensive approach to reporting disturbances and events that have the potential to impact the reliability of the Bulk-Power System and provides greater clarity concerning reportable events. Further, we find that NERC has adequately addressed the Commission’s directives pertaining to event reporting, including requiring the periodic update of reporting procedures. With regard to the Order No. 693 directives that NERC further refine the definition of “sabotage” and provide guidance on events that trigger reporting,we find that NERC’s development of Attachment 1, which lists specific types of reportable events and thresholds for reporting, represents an equally efficient and effective approach to address our underlying concern.

**Revision History**

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| --- | --- | --- | --- |
| **Version** | **Date** | **Reviewers** | **Revision Description** |
| 1 | 10/15/2013 | RSAW Task Force, NERC Legal | New Document |
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1. NERC developed this Reliability Standard Audit Worksheet (RSAW) language in order to facilitate NERC’s and the Regional Entities’ assessment of a registered entity’s compliance with this Reliability Standard. The NERC RSAW language is written to specific versions of each NERC Reliability Standard. Entities using this RSAW should choose the version of the RSAW applicable to the Reliability Standard being assessed. While the information included in this RSAW provides some of the methodology that NERC has elected to use to assess compliance with the requirements of the Reliability Standard, this document should not be treated as a substitute for the Reliability Standard or viewed as additional Reliability Standard requirements. In all cases, the Regional Entity should rely on the language contained in the Reliability Standard itself, and not on the language contained in this RSAW, to determine compliance with the Reliability Standard. NERC’s Reliability Standards can be found on NERC’s website. Additionally, NERC Reliability Standards are updated frequently, and this RSAW may not necessarily be updated with the same frequency. Therefore, it is imperative that entities treat this RSAW as a reference document only, and not as a substitute or replacement for the Reliability Standard. It is the responsibility of the registered entity to verify its compliance with the latest approved version of the Reliability Standards, by the applicable governmental authority, relevant to its registration status.

The NERC RSAW language contained within this document provides a non‑exclusive list, for informational purposes only, of examples of the types of evidence a registered entity may produce or may be asked to produce to demonstrate compliance with the Reliability Standard. A registered entity’s adherence to the examples contained within this RSAW does not necessarily constitute compliance with the applicable Reliability Standard, and NERC and the Regional Entity using this RSAW reserves the right to request additional evidence from the registered entity that is not included in this RSAW. Additionally, this RSAW includes excerpts from FERC Orders and other regulatory references. The FERC Order cites are provided for ease of reference only, and this document does not necessarily include all applicable Order provisions. In the event of a discrepancy between FERC Orders, and the language included in this document, FERC Orders shall prevail. [↑](#footnote-ref-1)