

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

# EOP-004-4 – Event Reporting

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

|  |  |
| --- | --- |
| **Audit ID:** | Audit ID if available; or REG-NCRnnnnn-YYYYMMDD |
| **Registered Entity:** | Registered name of entity being audited |
| **NCR Number:** | NCRnnnnn |
| **Compliance Enforcement Authority:** | Region or NERC performing audit |
| **Compliance Assessment Date(s)[[2]](#footnote-2):** | Month DD, YYYY, to Month DD, YYYY |
| **Compliance Monitoring Method:** | [On-site Audit | Off-site Audit | Spot Check] |
| **Names of Auditors:** | Supplied by CEA |

# **Applicability of Requirements**

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|  | **BA** | **DP** | **GO** | **GOP** | **IA** | **PA** | **RC** | **RP** | **RSG** | **TO** | **TOP** | **TP** | **TSP** |
| **R1** | X | X | X | X |  |  | X |  |  | X | X |  |  |
| **R2** | X | X | X | X |  |  | X |  |  | X | X |  |  |

**Legend:**

|  |  |
| --- | --- |
| Text with blue background: | Fixed text – do not edit |
| Text entry area with Green background: | Entity-supplied information |
| Text entry area with white background: | Auditor-supplied information |

Findings

**(This section to be completed by the Compliance Enforcement Authority)**

|  |  |  |  |
| --- | --- | --- | --- |
| Req. | Finding | Summary and Documentation | Functions Monitored |
| R1 |  |  |  |
| R2 |  |  |  |

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| Req. | Areas of Concern |
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| Req. | Recommendations |
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| Req. | Positive Observations |
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Subject Matter Experts

Identify the Subject Matter Expert(s) responsible for this Reliability Standard.

Registered Entity Response (Required; Insert additional rows if needed):

|  |  |  |  |
| --- | --- | --- | --- |
| 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-004-4 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).

**M1.** Each Responsible Entity will have a dated event reporting Operating Plan that includes protocol(s) and each organization identified to receive an event report for event types specified in EOP-004-4 Attachment 1 and in accordance with the entity responsible for reporting.

**Compliance Narrative (Required)**:

Provide a brief explanation, in your own words, of how you comply with this Requirement. References to supplied evidence, including links to the appropriate page, are recommended.

Evidence Requested:i

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| --- |
| The entity’s dated event reporting Operating Plan. |

Registered Entity Evidence (Required):

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| --- | --- | --- | --- | --- | --- |
| The following information is requested for each document submitted as evidence. Evidence submitted should be highlighted and bookmarked, as appropriate, to identify the exact location where evidence of compliance may be found. | | | | | |
| **File Name** | **Document Title** | **Revision or Version** | **Document Date** | **Relevant Page(s) or Section(s)** | **Description of Applicability of Document** |
|  |  |  |  |  |  |
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Evidence Reviewed by Audit Team (This section to be completed by the Compliance Enforcement Authority):

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Compliance Assessment Approach Specific to EOP-004-4, R1

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

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| --- | --- |
|  | (R1) Verify the entity’s event reporting Operating Plan contains protocols for reporting to the ERO for all applicable event types specified in EOP-004-4 Attachment 1. |
|  | (R1) Verify the entity’s event reporting Operating Plan identifies protocols for reporting to other organizations (e.g., the Regional Entity, company personnel, the Responsible Entity’s Reliability Coordinator, law enforcement, or governmental authority) as needed for each event type specified in EOP-004-4 Attachment 1. |
| **Note to auditor**: See Column "Entity with Reporting Responsibility” in EOP-004-4 Attachment 1 for applicable event types. | |

Auditor Notes:

R2 Supporting Evidence and Documentation

**R2.**  Each Responsible Entity shall report events specified in EOP-004-4 Attachment 1 to the entities specified per their event reporting Operating Plan by the later of 24 hours of recognition of meeting an event type threshold for reporting or by the end of the Responsible Entity’s next business day (4 p.m. local time will be considered the end of the business day).

**M2.**  Each Responsible Entity will have as evidence of reporting an event to the entities specified per their event reporting Operating Plan either a copy of the completed EOP-004-4 Attachment 2 form or a DOE-OE-417 form; and some evidence of submittal (e.g., operator log or other operating documentation, voice recording, electronic mail message, or confirmation of facsimile) demonstrating that the event report was submitted by the later of 24 hours of recognition of meeting an event type threshold for reporting or by the end of the Responsible Entity’s next business day (4 p.m. local time will be considered the end of the business day).

**Responsible Entity Response (Required)**

**Question:** Has the Responsible Entity had a reportable event, as described in EOP-004-4 Attachment 1, during the compliance monitoring 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. If No, describe how this was determined in the narrative section below.

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| --- | --- | --- |
| Date and Time of Event | Event Description | Date and Time Event Reported |
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**Compliance Narrative (Required)**:

Provide a brief explanation, in your own words, of how you comply with this Requirement. References to supplied evidence, including links to the appropriate page, are recommended.

Evidence Requested:i

|  |
| --- |
| The entity’s dated event reporting Operating Plan. |
| Evidence the entity reported applicable events specified in EOP-004-4 Attachment 1 to the entities specified in the event reporting Operating Plan. |
| Evidence the event report was submitted by the later of 24 hours of recognition of meeting an event type threshold for reporting or by the end of the Responsible Entity’s next business day (4 p.m. local time will be considered the end of the business day). |

Registered Entity Evidence (Required):

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
| The following information is requested for each document submitted as evidence. Evidence submitted should be highlighted and bookmarked, as appropriate, to identify the exact location where evidence of compliance may be found. | | | | | |
| **File Name** | **Document Title** | **Revision or Version** | **Document Date** | **Relevant Page(s) or Section(s)** | **Description of Applicability of Document** |
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Evidence Reviewed by Audit Team (This section to be completed by the Compliance Enforcement Authority):

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Compliance Assessment Approach Specific to EOP-004-4, R2

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

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|  | (R2) For each reportable event (applicable events specified in EOP-004-4 Attachment 1) experienced by the entity, verify the entity reported the event to the entities specified in the event reporting Operating Plan. |
|  | (R2) For each reportable event (applicable events specified in EOP-004-4 Attachment 1) experienced by the entity, verify event reports were submitted by the later of 24 hours of recognition of meeting an event type threshold for reporting or by the end of the Responsible Entity’s next business day (4 p.m. local time will be considered the end of the business day). |
|  | (R2) If adverse conditions prevented an entity from reporting the damage caused by an event and issuing a written Event Report within the timing of the Standard, verify the entity notified parties per Requirement R2 and provided as much information as is available at the time of the notification. |
| **Note to auditor:** EOP-004-4 Attachment 1 states, “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:

Additional Information:

Reliability Standard



In addition to the Reliability Standard, there is background information available on the NERC Web Site.

Capitalized terms in the Reliability Standard refer to terms in the NERC Glossary, which may be found on the NERC Web Site.

Sampling Methodology

Sampling is essential for auditing compliance with NERC Reliability Standards since it is not always possible or practical to test 100% of either the equipment, documentation, or both, associated with the full suite of enforceable standards. The Sampling Methodology Guidelines and Criteria (see NERC website), or sample guidelines, provided by the Electric Reliability Organization help to establish a minimum sample set for monitoring and enforcement uses in audits of NERC Reliability Standards.

Regulatory Language

The Federal Energy Regulatory Commission (“FERC”) approved EOP-004-4 on January 18, 2018. [*Emergency Preparedness and Operations Reliability Standards*, Order No. 840, 162 FERC ¶ 61,020 (2018) (“Order No. 840”)](http://nercdotcomstage/FilingsOrders/us/FERCOrdersRules/E-3_Order%20Approving%20EOP%20Stds.pdf).

In Order No. 840 at P 9, FERC determined that:

Reliability Standard EOP-004-4 will enhance reliability by assigning reporting responsibilities to appropriate entities and clarifying the threshold reporting for a given event. In addition, aligning the reportable events and thresholds, where appropriate, identified in Attachments 1 and 2 of the Reliability Standard with the Department of Energy’s Form OE-417 will improve the quality of information received by NERC and, as a result, the quality of analysis that NERC produces to assess the greatest risks to the bulk electric system. Further, Reliability Standard EOP-004-4 promotes efficiency and clarity by eliminating redundant reporting of a single event by multiple entities. The Commission determines that Reliability determine[d] that Reliability Standards EOP-005-3, EOP-006-3, and EOP-008-2 will enhance reliability by delineating the roles and responsibilities of entities that support system restoration from blackstart resources; clarifying the procedures and coordination requirements for reliability coordinator personnel to execute system restoration processes; and refining the contents of an operating plan used by reliability coordinators, balancing authorities, and transmission operators to maintain the reliability of the BES in the event that primary control center functionality is lost.

Selected Glossary Terms

Operating Plan - A document that identifies a group of activities that may be used to achieve some goal. An Operating Plan may contain Operating Procedures and Operating Processes. A company specific system restoration plan that includes an Operating Procedure for black-starting units, Operating Processes for communicating restoration progress with other entities, etc., is an example of an Operating Plan.

Revision History for RSAW

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| --- | --- | --- | --- |
| **Version** | **Date** | **Reviewers** | **Revision Description** |
| 1 | 09/26/2018 | NERC Compliance Assurance, RSAW Task Force | New Document |
|  |  |  |  |

i Items in the Evidence Requested section are suggested evidence that may, but will not necessarily, demonstrate compliance. These items are not mandatory and other forms and types of evidence may be submitted at the entity’s discretion.

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 RSAW may provide a nonexclusive 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 reserve the right to request additional evidence from the registered entity that is not included in this RSAW. This RSAW may include excerpts from FERC Orders and other regulatory references which 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)
2. Compliance Assessment Date(s): The date(s) the actual compliance assessment (on-site audit, off-site spot check, etc.) occurs. [↑](#footnote-ref-2)