

Compliance and Certification Committee Nomination Form

In the capacity of a North American Electric Reliability Corporation (NERC) Board of Trustees (Board)-appointed stakeholder committee serving and reporting directly to the NERC Board, the Compliance and Certification Committee (CCC) will engage with support, and advise the NERC Board and NERC Staff regarding all facets of the NERC Compliance Monitoring and Enforcement Program, Organization Registration Program, and Organization Certification Program.

The CCC has an open nomination process. Individuals or recognized industry groups may nominate candidates for consideration. A nominee that represents a NERC member may only be nominated for a sector that matches the NERC member’s sector under the NERC membership list (to check a NERC member’s sector, please consult the [NERC membership list](#)).

Please review the CCC Charter for information regarding the responsibilities of CCC members.

Nominee Information	
Name	Keith Porterfield
Organization	Georgia System Operations Corporation (Electric Cooperative)
NERC Compliance Registry (NCR)	01248
Sector Membership	Sector 3 - Cooperative
Title	Vice President and Chief Legal and Compliance Officer
Department, Division, or Unit	Legal and Compliance
Email Address	keith.porterfield@gasoc.com
Telephone	770-270-7374
Brief biographical sketch of nominee including present position	<p>Keith Porterfield is Vice President and Chief Legal and Compliance Officer for Georgia System Operations Corporation (GSOC), a not-for-profit corporation owned by 38 of Georgia’s distribution electric membership corporations, Oglethorpe Power Corporation (OPC) and Georgia Transmission Corporation (GTC). He has been with the company since 1991 when he joined OPC as a Telecommunications Engineer. Through a corporate restructuring, he transitioned to GSOC and was appointed Manager of Telecommunications. He earned his law degree in 2001, and in 2009 assumed the role of General Counsel & Manager of Corporate Compliance for GSOC. In 2012, he returned to the field of telecommunications, and as Vice President of Telecommunications, he led GSOC’s efforts in improving its communications networks and ensuring their compliance with all applicable standards. In 2017, he returned to the legal field to assume responsibility for GSOC’s legal affairs and in 2018 was named GSOC’s Chief Legal and Compliance Officer.</p> <p>He received his bachelor’s and master’s degrees in Electrical Engineering from Columbia University in New York City and graduated Magna Cum Laude from Georgia State University, College of Law in 2001.</p>

<p>Description of nominee’s general compliance experience/knowledge (e.g. regional council compliance committee, corporate compliance, etc.)</p>	<p>As General Counsel and Manager, Corporate Compliance from 2009 to 2012, Keith administered the corporation’s Ethics and Compliance Program, including NERC/SERC compliance. He provided legal review, analysis, and advice with respect to electric reliability and energy market legislation and regulations, and reliability standards promulgated by FERC, NERC, and SERC. Specific responsibilities included:</p> <ul style="list-style-type: none"> - Annual review and update of all corporate policies - Implementing and administering the corporation’s compliance hotline - Investigating and resolving all reported compliance issues - Administering GSOC’s compliance awareness program to ensure that all associates were familiar with their compliance obligations. <p>As Vice President, Legal since 2017, he returned to this role and provided guidance to all areas of GSOC’s compliance program. Currently, as Chief Legal and Compliance Officer, he has ultimate responsibility for all of GSOC’s compliance obligations.</p>
<p>Description of nominee’s compliance enforcement experience/knowledge (e.g. regulatory process, ERO rules of procedure, NERC sanctioning guidelines etc.)</p>	<p>Keith is an active and current member of the NERC CCC and the EROMS. In those roles, Keith participated as an observer in NERC IA’s audit of the Regional Entities’ assessments of the internal controls of Registered Entities and in the audit of NERC’s compliance with the ROP with respect to the Standards Development Process. He also participated as a CCC and EROMS member in NERC’s self-certification of compliance with the Rules of Procedure with respect to Compliance Monitoring and Enforcement. He has also participated in the CCC portion of the stakeholder perception survey process and in the review and update of various CCC procedures, including the CCC Charter, the Audit Participation Procedure, and the Criteria for Annual Regional Entity Program Evaluation.</p> <p>As a member of the NERC Standards Committee Process Subcommittee (SCPS), Keith participated in drafting and reviewing modifications to the ERO Rules of Procedure Section 300 and Appendix 3A (Standards Development Process).</p> <p>As part of the EOP-008 SDT, he assisted in the development and evaluation of Violation Risk Factors and Violation Severity Levels. As a member of the NERC SCPS, he participated in efforts to evaluate the effectiveness of and consider modifications to the way these factors were used in establishing penalties for violations of NERC Standards.</p> <p>As General Counsel and Manager, Corporate Compliance, he participated in the enforcement and settlement process associated with potential violations self-reported by GSOC. He performed analysis of new reliability standards requirements to determine their application to GSOC and participated in the NERC Standards Quality Review Program and the NERC SCPS. Keith led the SCPS working group responsible for documenting revisions to the quality review process.</p> <p>This combination of experience from both sides of the compliance enforcement process provides Keith with a broad perspective which will be valuable to the CCC.</p>
<p>Description of nominee’s compliance administration/management</p>	<p>As General Counsel and Manager, Corporate Compliance, Keith had responsibility for all aspects of GSOC’s compliance program. He was responsible for overall corporate compliance, including review,</p>

<p>experience/knowledge (e.g. setting up or participation in corporate compliance program)</p>	<p>interpretation and implementation of corporate policies as well as oversight of specific compliance programs (e.g. compliance with NERC/SERC standards, FERC rulings, EEOC, HIPAA).</p> <p>Keith has been actively involved in compliance activities throughout his career. He has served as a subject matter expert in both the CIP and BES areas for NERC/SERC audits. With respect to BES compliance (also referred to as 693 compliance), he served as a subject matter expert for multiple audits and was a member of the EOP-008 Standard Drafting Team. With regard to the CIP standards, he was instrumental in GSOC's initial compliance with the Cyber Security Urgent Action 1200 standard and continued to be an important part of GSOC's compliance efforts through versions 3 and 5 and continuing through this time. While Keith was working in Corporate Compliance, GSOC restructured its NERC Compliance program. Keith was an active participant in establishing GSOC's initial processes and procedures to administer its compliance with NERC standards and its participation with the NERC standards development process. He contributed to the creation of processes covering the following topics:</p> <ul style="list-style-type: none"> - Commenting and balloting on new or modified standards - Conducting gap analysis for newly adopted standards - Investigating potential non-compliance
<p>Description of nominee's organizational certification experience/knowledge (e.g. ERO registry criteria familiarity/interpretation etc.)</p>	<p>GSOC has an unusual corporate structure which requires extremely close and complex coordination with related organizations. GSOC is responsible for the real-time operation of assets owned and operated by GTC and OPC. GSOC must also work very closely with Georgia Power Company and Southern Company, as they are joint participants with GTC in Georgia's Integrated Transmission System. GSOC also works very closely with its distribution electric cooperative members.</p> <p>Because of these complex relationships, ERO registry questions that might typically be straightforward are difficult to resolve. Keith has been involved in a variety of situations which required review and analysis of certification criteria and how our operations match with those criteria. He has also been a part of initiatives to review the potential for coordinated functional registration with other entities. He was instrumental in the development of a Reliability Standards Agreement between OPC, GTC, and GSOC to clarify these roles. This document was developed with the understanding that it could form the basis of a coordinated functional registration agreement if one becomes appropriate.</p>
<p>Description of nominee's general NERC experience/background (e.g. NERC/RRO Committees, Standard Drafting Teams, Task Force, etc.)</p>	<p>As a member of the NERC EOP-008 Standard Drafting Team, Keith participated in the update of requirements to have backup control center functionality. The team was able to achieve a clearer specification of those requirements while giving entities the necessary flexibility to meet the requirements in ways that make economic and operational sense.</p> <p>As a member of the SCPS, Keith gained insight into the overall working relationship between utilities, trade organizations, Regional Reliability Organizations (RROs), and NERC staff, which would be invaluable as a member of the CCC.</p> <p>By serving as proxy for previous CCC member Clay Smith and a frequent observer of CCC and EROMS meetings, Keith kept current on the ongoing tasks and priorities of the CCC prior to becoming a full member of the CCC.</p>

Sector Information	
<p>Membership sector(s) that nominee is nominated for and is qualified to represent</p>	<p><input type="checkbox"/> Sector 1 – Investor-owned Utility</p> <p><input type="checkbox"/> Sector 2 – State/Municipal Utility</p> <p><input checked="" type="checkbox"/> Sector 3 – Cooperative Utility</p> <p><input type="checkbox"/> Sector 4 – Federal or Provincial Utility/Power Marketing Administration</p> <p><input type="checkbox"/> Sector 5 – Transmission-dependent Utility</p> <p><input type="checkbox"/> Sector 6 – Merchant Electricity Generator</p> <p><input type="checkbox"/> Sector 7 – Electricity Marketer</p> <p><input type="checkbox"/> Sector 8 – Large End Use Electricity Customer</p> <p><input type="checkbox"/> Sector 9 – Small End Use Electricity Customer</p> <p><input type="checkbox"/> Sector 10 – ISO/RTO</p> <p><input type="checkbox"/> Sector 12 – Government Representatives</p> <p style="padding-left: 20px;"><input type="checkbox"/> U.S. State</p> <p style="padding-left: 20px;"><input type="checkbox"/> U.S. Federal</p> <p style="padding-left: 20px;"><input type="checkbox"/> Canadian Federal</p> <p style="padding-left: 20px;"><input type="checkbox"/> Canadian Provincial</p> <p><input type="checkbox"/> At-Large</p>

Nominator Information	
<p>Nominated by (please check one)</p>	<p><input type="checkbox"/> Individual</p> <p><input checked="" type="checkbox"/> Organization</p> <p><input type="checkbox"/> Self-nomination</p>
<p>Name</p>	<p>Gregory S. Ford</p>
<p>Organization</p>	<p>Georgia System Operations Corporation</p>
<p>Email Address</p>	<p>Greg.ford@gasoc.com</p>
<p>Telephone</p>	<p>770-270-7955</p>