

Reliability Standard Audit Worksheet¹

IRO-001-4 – Reliability Coordination – Responsibilities

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: 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

	BA	DP	GO	GOP	IA	LSE	PA	PSE	RC	RP	RSG	TO	TOP	TP	TSP
R1									X						
R2	X	X		X									X		
R3	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

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.

² Compliance Assessment Date(s): The date(s) the actual compliance assessment (on-site audit, off-site spot check, etc.) occurs.

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Findings

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

Req.	Finding	Summary and Documentation	Functions Monitored
R1			
R2			
R3			

Req.	Areas of Concern

Req.	Recommendations

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 Reliability Coordinator shall act, or direct others to act, by issuing Operating Instructions, to ensure the reliability of its Reliability Coordinator Area.
- M1.** Each Reliability Coordinator shall have and provide evidence which may include, but is not limited to dated operator logs, dated records, dated and time-stamped voice recordings or dated transcripts of voice recordings, electronic communications, or equivalent documentation, that will be used to determine that it acted, or directed others to act, by issuing Operating Instructions to ensure the reliability of its Reliability Coordinator Area.

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:

Provide the following evidence, or other evidence to demonstrate compliance.
Dated operator logs, dated records, dated and time-stamped voice recordings or dated transcripts of voice recordings, electronic communications, or equivalent documentation associated with events requested by auditor.

Registered Entity Evidence (Required):

The following information is requested for each document submitted as evidence. Also, 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

Audit Team Evidence Reviewed (This section to be completed by the Compliance Enforcement Authority):

Compliance Assessment Approach Specific to IRO-001-4, R1

This section to be completed by the Compliance Enforcement Authority

	(R1) For all, or a sample of, BES events selected by auditor, review evidence and verify entity acted, or directed others to act, by issuing Operating Instructions to ensure the reliability of its Reliability
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Coordinator Area.

Note to Auditor: Auditors are advised to monitor compliance with Requirement R1 during events, due to the importance of issuing Operating Instructions in such instances. Auditors can obtain a population of events for sampling from NERC's, or the Regional Entity's, records of mandatory event reports~~Event, other~~ information available at the Regional Entities, or a query of the entity. Auditors are encouraged to monitor compliance during the most critical events on the entity's system occurring during the compliance monitoring period, ~~generally category 2 events or higher.~~

Auditor Notes:

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R2 Supporting Evidence and Documentation

- R2.** Each Transmission Operator, Balancing Authority, Generator Operator, and Distribution Provider shall comply with its Reliability Coordinator's Operating Instructions unless compliance with the Operating Instructions cannot be physically implemented or unless such actions would violate safety, equipment, regulatory, or statutory requirements.
- M2.** Each Transmission Operator, Balancing Authority, Generator Operator, and Distribution Provider shall have and provide evidence which may include but is not limited to dated operator logs, dated records, dated and time-stamped voice recordings or dated transcripts of voice recordings, electronic communications, or equivalent documentation, that will be used to determine that it complied with its Reliability Coordinator's Operating Instructions, unless the instruction could not be physically implemented, or such actions would have violated safety, equipment, regulatory or statutory requirements. In such cases, the Transmission Operator, Balancing Authority, Generator Operator, Transmission Service Provider, or Distribution Provider shall have and provide copies of the safety, equipment, regulatory, or statutory requirements as evidence for not complying with the Reliability Coordinator's Operating Instructions. If such a situation has not occurred, the Transmission Operator, Balancing Authority, Generator Operator, Transmission Service Provider, or Distribution Provider may provide an attestation.

Registered Entity Response (Required):

Question: Did the entity receive an Operating Instruction from the Reliability Coordinator during the audit period?

Yes No

If No, state how this was ascertained. If yes, provide a list of instances of receiving Operating Instructions from the Reliability Coordinator.

[Note: A separate spreadsheet or other document may be used. If so, provide the document reference below.]

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 Requested¹:

Provide the following evidence, or other evidence to demonstrate compliance.

Dated operator logs, dated records, dated and time-stamped voice recordings or dated transcripts of voice recordings, electronic communications, or equivalent documentation.

Registered Entity Evidence (Required):

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The following information is requested for each document submitted as evidence. Also, 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

Audit Team Evidence Reviewed (This section to be completed by the Compliance Enforcement Authority):

Compliance Assessment Approach Specific to IRO-001-4, R2

This section to be completed by the Compliance Enforcement Authority

	(R2) For a sample of events, review evidence to determine if the entity received Operating Instructions from the Reliability Coordinator. For all, or a sample of, events selected by <u>the</u> auditor verify the following:
	(R2) Review evidence that the entity complied with the Reliability Coordinator’s Operating Instructions.
	(R2) If the entity determined that it could not comply with the Reliability Coordinator’s Operating Instructions, examine evidence to verify that <u>the</u> entity’s compliance with the Operating Instructions would <u>have</u> violated <u>d</u> safety, equipment, regulatory, or statutory requirements.

Note to Auditor: Auditors are advised to monitor compliance with Requirement R2 during events, due to the likelihood and importance of ~~receiving and~~ complying with, ~~respectively,~~ Operating Instructions during such instances. Auditors can obtain a population of events for sampling from NERC’s, or the Regional Entity’s, records of mandatory event reports, other information available at the Regional Entities, or a query of the entity. Auditors are encouraged to monitor compliance during the most critical events on the entity’s system occurring during the compliance monitoring period. ~~Auditors can obtain a population of events for sampling from NERC’s Event Database, information available at the Regional Entities, query of the entity’s Reliability Coordinator, or query of the entity. Auditors are encouraged to monitor compliance during the most critical events on the entity’s system occurring during the compliance monitoring period, generally category 2 events or higher.~~

Auditor Notes:

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R3 Supporting Evidence and Documentation

- R3.** Each Transmission Operator, Balancing Authority, Generator Operator, and Distribution Provider shall inform its Reliability Coordinator of its inability to perform the Operating Instruction issued by its Reliability Coordinator in Requirement R2.
- M3.** Each Transmission Operator, Balancing Authority, Generator Operator, and Distribution Provider shall have and provide evidence which may include but is not limited to dated operator logs, dated records, dated and time-stamped voice recordings or dated transcripts of voice recordings, electronic communications, or equivalent documentation, that will be used to determine that it informed its Reliability Coordinator of its inability to perform an Operating Instruction issued by its Reliability Coordinator in Requirement R1.

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:

Provide the following evidence, or other evidence to demonstrate compliance.
Dated operator logs, dated records, dated and time-stamped voice recordings or dated transcripts of voice recordings, electronic communications, or equivalent documentation.

Registered Entity Evidence (Required):

The following information is requested for each document submitted as evidence. Also, 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

Audit Team Evidence Reviewed (This section to be completed by the Compliance Enforcement Authority):

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Compliance Assessment Approach Specific to IRO-001-4, R3

This section to be completed by the Compliance Enforcement Authority

(R3) For all, or a sample of, events selected by the auditor, determine if the entity was not able to comply with ~~received~~ Operating Instructions issued by ~~from its~~ the Reliability Coordinator ~~and was not able to comply.~~; Rreview evidence and verify that the entity then informed its Reliability Coordinator of the inability to perform the Operating Instructions.

Note to Auditor: Auditors are advised to monitor compliance with Requirement R3 during events, due to the likelihood and importance of ~~receiving and~~ complying with, ~~respectively,~~ Operating Instructions during such instances. Auditors can obtain a population of events for sampling from NERC's, or the Regional Entity's, records of mandatory event reports, other information available at the Regional Entities, or a query of the entity. Auditors are encouraged to monitor compliance during the most critical events on the entity's system, occurring during the compliance monitoring period. ~~Auditors can obtain a population of events for sampling from NERC's Event Database, information available at the Regional Entities, query of the entity's Reliability Coordinator, or query of the entity. Auditors are encouraged to monitor compliance during the most critical events on the entity's system occurring during the compliance monitoring period, generally category 2 events or higher.~~

Samples selected for Requirement R3 should consider Operating Instructions received by the entity under Requirement R2 that the entity did not comply with.

Auditor Notes:

Additional Information:

Reliability Standard

To be inserted by RSAW developer prior to posting of this RSAW associated with the enforceable date of this Reliability Standard.

Sampling Methodology

To be inserted by RSAW developer prior to posting of this RSAW associated with the enforceable date of this Reliability Standard, if applicable.

Regulatory Language

To be inserted by NERC Legal prior to posting of this RSAW associated with the enforceable date of this Reliability Standard.

Selected Glossary Terms

To be inserted by RSAW developer prior to posting of this RSAW associated with the enforceable date of this Reliability Standard, if applicable.

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Revision History for RSAW

Version	Date	Reviewers	Revision Description
1	06/20/2014	Initial Posting	New Document
2	08/29/2014	NERC Compliance, NERC Standards, RSAWTF	Revisions for updated standard language and comments received during comment period.
<u>3</u>	<u>10/16/2014</u>	<u>NERC Compliance, NERC Standards</u>	<u>Revisions based on comments received during second comment period.</u>

¹ 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.