



SPP Reliability Standards Development Group – Implementation Process Part 1 of 2

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Process Intro

- Why?
- Embrace full compliance program
- Assure all opportunities are maximized
- Improves development activities
- Deliberate, repeatable, trackable process

Process Intro

- What?
- Monitoring/Coordination
- Provide direct participation/feedback
- Initiate internal implementation efforts

Timeline Monitoring



Monitoring and Coordination

- Pro-actively and continually monitor for any proposed changes in NERC or Regional Standards applicable to SPP and SPP Member Registered Functions
- Give consideration to guidelines and interpretations, as well as other compliance guidance policy documentation
- Recognize changes that impact SPP or SPP Member Registered Functions
- Initiate Phase I, II and III internally and/or externally as applicable

Timing

- Maximize opportunities
 - Larger course corrections early
 - Catch 'ah ha!' moments/interpretations early
 - Start scoping implementation effort early
- Identify if Not Applicable to SPP
 - Process is handled via Email vs. Face to Face
- Informational/Non-standards
 - Case by Case treatment
 - As the information becomes available and is relevant
 - Examples – FMAG. Rules of Procedure, CMEP...

Internal –



Phase I

- Projects in Phase 1 are projects that are still in early stages of development
 - SAR
 - Technical Conferences
 - Initial Draft(s)

- Product expectations
 - Quality feedback for NERC SDT's
 - Internal (RTO) 'compliance design' discussed/scoped
 - Issues identified (interpretation questions, definition concerns, etc) for resolution by Development staff

Phase 2

- Once a project issues a 'Final Ballot' posting, it is categorized as Phase 2
- Drafting team considers the revisions complete and expects the language to pass industry review
- There is little opportunity for adjusting the Standard in Phase 2 as drafting teams are not likely receptive to making changes
- **Product Expectations**
 - Scoped/'complete' compliance design
 - SME's/Responsible task owners identified
 - Resource effort scopes listed (Gantt Charts with durations/no start-end dates)
 - Budget/Headcount/Org impacts inserted appropriately

Phase 3

- Projects in Phase 3 are considered 'complete' from a development point of view
- The project has been approved by the NERC Board of Trustees (BOT) and has been or will be filed with FERC for approval
- Only major legal challenges to FERC may adjust the Standard or enforcement dates
- 'Compliance design' tasks initiated
 - Resources allocated
 - Authorization to begin efforts

External – SPP Members



Member Outreach Activities

- Comment Development Calls and WebEx's (Primarily limited to Phase 1 and Phase 2)
- Discussion of relevant balloting positions for the Project with the SPP Executive Director, Interregional Affairs
- Decipher and investigate discrepancies in position between SPP positions and SPP stakeholder positions
- Communicate both positions (and differences) as necessary to the ISO/RTO Standards Review Committee (SRC)
- Encourage participation from working group members and member entities staff to participate in the process of influencing the Standards under-development
- Submit the comments to NERC staff via the NERC Standards Balloting System (SBS)
- RCWG and/or Forum Agenda Topics

Compliance Design



Compliance Design Questions (1 of 2)

- Selected 'seed' questions that can be asked of Business SME's when reviewing draft Standards or revisions in order to determine necessary comments, issues or develop initial compliance design action plans are used in Phase 1
- In each subsequent phase, these questions/action items, are enhanced and continue to be tracked through completion
 - Parking lot items
 - Interpretation issues
 - Forms bounds of resources and capabilities available to complete the draft design

Compliance Design Questions (2 of 2)

- Is there a need for Interpretation of the standard changes?
- What staff and/or departments need to be included in the implementation and roll-out?
- Is a new process or procedure necessary in order to meet this requirement?
- Is a revision to a process or procedure necessary in order to meet this requirement?
- Is there a Working Group(s) that needs to be included as part of this process?
- Is a Revision Request necessary in order to meet this requirement? If so, what is the timeline to MOPC approval?
- Is Training required in order to meet this requirement?
- Are there any additional resources needed – temporary staff or consultants, hardware, storage, applications?
- Are there any budgetary items necessary in order to meet this requirement?

Tracking & Reporting



Dashboard Tracking

- One site, one spot - tracking and reporting at any time
- Tracks through to Completion and Compliance Hand-off

File Home Insert Page Layout Formulas Data Review View ACROBAT Tell me what you want to do...

Clipboard Font Alignment Number Styles Cells Editing

Normal Bad Good Neutral Calculation Check Cell

F18

SPP Reliability Standards Development Process - Internal Tracker

| Initial Date | Standard/ Topic | Owner(s) | Monitoring Method | Phase Level | Effective Date | Functional Area | Registered Function | Outreach | SPP Votes | Action Item(s) | Legal | Compliance | Hand-off | Status |
|----------------|-----------------|----------------|-------------------------|---------------|-----------------|-----------------|-----------------------|----------|-----------|---|-------|------------|----------|--------|
| April 25, 2016 | TOP-003.3 | OPs | Formal Ballot | Phase 3 | January 1, 2017 | RC, BA | SPP and SPP Member(s) | Yes | Yes | Needs Close out meeting and hand off to Compliance | Yes | Yes | No | Open |
| April 25, 2016 | RO-010.2 | OPs | Formal Ballot | Phase 3 | January 1, 2017 | BA | SPP and SPP Member(s) | Yes | Yes | Needs Close out meeting and hand off to Compliance | Yes | Yes | No | Open |
| August 8, 2016 | FMAG | Sharon Mickens | Informal Comment Period | Informational | | PC, RC, BA, TP | SPP and SPP Member(s) | Yes | | Discussion of the Functional Model proposed language revisions and the potential impacts on SPP Registered Functions (PC, TP, RC, BA) were discussed. Comments from internal staff were requested via email on 8/1/2016. Next meeting will be late October / early November after the next face to face meeting. | Yes | Yes | No | Open |

SME Lists

- Distribution Lists have been created for easy meeting planning for the Implementation Process invites
- SME list are maintained and reviewed quarterly by the Standards Development Group to ensure the right staff is at the right meetings
 - OPS (TOP, IRO, FAC, EOP, etc)
 - PLANNING (FAC, MOD, TPL, PRC, etc)
 - CIP/IT (CIP)
 - TRAINING (PER)
 - LEGAL (All)
 - COMPLIANCE (All)
 - STANDARDS DEVELOPMENT STAFF (All)

Compliance Hand-off



Standards Development to Compliance

- Once Phase 3 is reached, the Standards Development Group transitions efforts to the Compliance Oversight and Assurance efforts.
- Phase 3 Completion Includes:
 - All action items closed out/assigned
 - Milestones for the process have been met
 - Compliance design agreed to by all affected parties
 - Agreement that compliance design will reasonable result in compliance
 - Compliance, Legal and Business SMEs have been consistently involved in the process loop
 - Dashboard report sent to:
 - Compliance Manager
 - Compliance Director

Team Site & Storage



Final Documentation

- SharePoint Team Site
- Documents Water Marked – Internal Document Only
- Not used for evidence*
- Managed by Standards Development Group
- Contains:
 - Internal Tracker Location
 - Phase 1, 2, 3 Meeting Documentation
 - Comments and Voting Records
 - Outreach Events Captured
 - High level Compliance Design record (narratives/RSAW)

Questions on the Process







SPP Reliability Standards Development Group – Process in Action Part 2 of 2

Examples – TOP-003-3, IRO-010-2, PER-005-2, SOL, EOP

09-21, 2016

March 2016 – SPP Re-org

- Standards Development group moved under the Compliance Department
- Additional efforts added to Stds Dev for ensuring and documenting SPP internal implementation efforts
- Deliberate efforts to ensure SME's complete efforts by enforcement dates
- Outreach Coordinator (Kim) moved to Stds Development
- Phase (1, 2, and 3) process begun on projects where they currently reside

IRO-010-2 & TOP-003-3 Data Exchange



Phase 3 – FERC Approved

- Face to Face Internal Meeting Set – **April 25, 2016**
(Approved November 2015)
 - Meeting Invites Included:
 - SPP Standards Development Staff
 - **SPP Business SME's – Operations**
 - SPP Compliance Staff
 - SPP Legal Staff
- Meeting Kick-off Overview:
 - Background and Current Status Discussed
 - Known Interpretation Issues Reviewed
 - Recommendations for Compliance Design by Stds Dev
- Meeting Materials Provided and Reviewed:
 - NERC Standard Drafts
 - NERC Implementation Plan
 - Stds Dev opinions/recommendations



Action Item 1 - Initial

- Review using one vs 'combined' document – a single BA and a single RC document has many 'compliance' benefits.
 - Need to review pros/cons
- Recommend reviewing/changing title of document to say 'Data Specification for' Vs 'Data Dictionary'
- Add clarity for these facilities: including non-BES data and external network data, as deemed necessary by the Reliability Coordinator
- Review the data specification as listed in the Appendix of the Operating Criteria from the RC and BA perspective

Action Item 1 – Refined/Enhanced

- Consideration for a draft Revision Request (RR) on SPP Operating Criteria OP-1
- Involvement of the Operating Criteria Review Task Force (OCRTF) for sponsorship and 'review' of the Appendix/stand alone document
- Revision Request separating the appendix from the criteria to make it a stand-alone document
- We will add a statement for requests for other data, the non-BES related items. Something like, 'SPP may request additional information as needed. Requests will be made by phone or email or otherwise clearly documented.
- Put an internal process in place to email notifications for additional, specific data requests and keep the document posted on the Ops Portal

OCRTF/ORWG Efforts

- Stand-alone document (moved from Criteria) under review for initial posting
- ORWG comments received
- October 6 – ORWG Review
- January 1 version
 - Going forward – more detail
 - Expectations
 - Living document
 - Single vs ‘unique’ document(s)
- April 1, 2017 – demonstrate meeting the requests for data

PER-005-2



Phase 3 – FERC Approved

- Face to Face Internal Meeting Set – **June 2, 2016**
 - Meeting Invites Included:
 - SPP Standards Development Staff
 - SPP Business SME's – Operations
 - **SPP Training Staff**
 - SPP Compliance Staff
 - SPP Legal Staff
- Meeting Kick-off Overview:
 - Background and Current Status Discussed
 - Known Interpretation Issues Reviewed
 - SPP Vote
- Meeting Materials Provided and Reviewed:
 - NERC Standard Draft Redlines
 - NERC Implementation Plan



Action Item 1 – Initial

- Recognized that efforts (while not formalized) were largely already complete
- Training Program Development – Desk Qualification
- Operator Tracker Development – Job Task Analysis

Action Item – Refined/Enhanced

- Documentation Development was completed for:
 - Desk Qualification Program
 - Job Task Analysis
 - Qualification Card
- Training Development was completed for:
 - Operations Analysis 2016 Training Program
 - Computer based
 - Classroom
 - Crew exercises
 - Virtual led
 - Document review and sign off
- Training survey created
- IROL procedures and guides reviewed and updated
- Narratives (RSAW-like) completed to document ‘handoff’

SOL (2015-09) and EOP (2015-08)



Phase 1 – Informal/Initial Ballots

- Face to Face Internal Meeting Set – **August 9, 2016**
 - Meeting Invites Included:
 - SPP Standards Development Staff
 - **SPP Business SME's – Operations**
 - **SPP Business SME's – Planning**
 - SPP Compliance Staff
 - SPP Legal Staff
- Meeting Kick-off Overview:
 - Background and Current Status Discussed
 - Known Interpretation Issues Reviewed
- Meeting Materials Provided and Reviewed:
 - NERC Standard Draft Redlines
 - NERC Implementation Plan

Action Item 1 – Initial

- Initial Informational Meeting for both RC and PC staff
- SOL Overview (**PC/RC Functions**)
 - FAC-011-4
 - FAC-014-3
- **PC Function Portion Concludes**
 - EOP Overviews (**RC Function**)
 - EOP-004-4
 - EOP-005-3
 - EOP-006-3
 - EOP-008-2
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Action Item – Refined/Enhanced

- Phase 2 Meeting TBD (No time soon....)



