



**2008**

**Compliance Monitoring**

**And**

**Enforcement Program**

**Implementation Plan**

**November 1, 2007**

## **1) ReliabilityFirst Compliance Monitoring and Enforcement Program**

### **Implementation Plan**

The objective of ReliabilityFirst, as a Regional Entity, is to preserve and enhance electric service reliability and security for the interconnected electric systems within the ReliabilityFirst geographic area. To support this, ReliabilityFirst, through its role as outlined in the Regional Delegation Agreement, will monitor, assess, and enforce compliance with Regulatory Approved Reliability Standards for each Registered Entity that has functional responsibilities as determined by its organization's registration. ReliabilityFirst will also monitor, assess, and enforce compliance to ReliabilityFirst Reliability Standards for each ReliabilityFirst member that has functional responsibilities as stated above. ReliabilityFirst will verify compliance through one of the monitoring methods described in the ReliabilityFirst Compliance Monitoring and Enforcement Program (CMEP). ReliabilityFirst will utilize the Compliance Monitoring and Enforcement Program which has been filed with FERC in October 2007.

## **2) NERC Compliance Monitoring and Enforcement Program**

### **A. NERC Implementation Plan**

The NERC Compliance Monitoring and Enforcement Program 2008 Implementation Plan identifies NERC and Regional Entity responsibilities to monitor registered entities performance to the Reliability Standards. NERC will monitor and track performance of ReliabilityFirst in satisfying all their responsibilities as a Regional Entity.

### **B. NERC 2008 Reporting Requirements**

The annual NERC compliance program identifies the scope of monitoring for compliance to a specific subset of regulatory approved Reliability Standards. This subset of Reliability Standards will be "actively monitored" to ensure uniform compliance monitoring by all Regional Entities. A Registered Entity is responsible to comply with all applicable Reliability Standards and can be monitored for compliance to any and all applicable standards at any time and be subject to violations, penalties, and sanctions as defined by NERC.

### **C. Organization Registration and Certification**

NERC's Organization Registration Program is based on the functional entity data collected and provided by ReliabilityFirst as part of our delegated responsibility. The NERC Compliance Registry is the official list of owners, operators, and users of the bulk power system that are responsible for compliance with the NERC reliability standards. An updated organization certification process is expected to be implemented in the second quarter of 2008. This updated process will provide the process for initial certification of RCs, BAs, and TOPs.

## **3) ReliabilityFirst Compliance Monitoring and Enforcement Program**

ReliabilityFirst, in concert with the NERC staff, established the scope and type of monitoring methods to be used to monitor each standard for compliance. All requests for information to implement compliance monitoring will be sent to the Primary Compliance Contact (PCC). The PCC is an individual designated by each Registered Entity as its primary contact responsible for coordination and dissemination of data and submittals concerning compliance to the Reliability

Standards. The PCC can select an alternate to make submittals as directed. Any person designated as responsible for the submittal information for a Registered Entity may forward the information, as approved by the PCC or alternate, to the *ReliabilityFirst* staff directly, with copies to their PCC and alternate.

### **A. Compliance Data Management System**

*ReliabilityFirst* has implemented an electronic Compliance Data Management System (CDMS) to be used by the Registered Entities for the submittals of data and self-certifications indicating their performance in satisfying the requirements to the Reliability Standards. *ReliabilityFirst* Compliance staff will utilize this system in the data review and compliance assessments. Starting January 1, 2008, all Registered Entities are expected to make all compliance submittals via the CDMS.

### **B. Compliance Program Summary**

The *ReliabilityFirst* Compliance Program will include a total of 70 Reliability Standards determined to be actively monitored in 2008. This includes 60 Reliability Standards from the NERC required monitoring program, 6 *ReliabilityFirst* Standards and 4 additional NERC standards.

Compliance monitoring and assessment for the Critical Infrastructure Protection Standards, CIP-002-1 through CIP-009-1, will consist of self-certifications for the applicable Registered Entities identified in the CIP Standard Implementation Plan as C (Compliant). This monitoring for compliance will occur after June 30, 2008. (This monitoring will be predicated on the expected FERC approval of these standards.) For all other designated actions, BW (Begin Work), SC (Substantially Compliant), and AC (Auditably Compliant), Registered Entities will be surveyed for their status relative to these standards. Review Attachment A closely for expected response by Registered Entities.

#### **Attachment A - 2008 Compliance Monitoring Schedule**

This is considered a living document and will be updated periodically throughout the year to reflect due date adjustments and updates of revised or new standards.

#### **Attachment B - 2008 Compliance Audit Schedule**

This contains the on-site compliance audit schedules. Registered Entities scheduled for compliance audits will be assessed for compliance with all applicable Reliability Standards identified in **Attachment A**.

#### **Attachment C - 2008 NERC Readiness Evaluation Schedule**

This provides the lists of entities subject to a NERC Readiness Evaluation. *ReliabilityFirst* will facilitate stakeholder participation in these evaluations and will solicit support for evaluations outside of our region.

The ***ReliabilityFirst* Compliance Monitoring and Enforcement Program** and all relevant compliance materials can be found on the ***ReliabilityFirst* website** at <http://www.rfirst.org>.

## **C. Non-Submittal of Data**

If data (including Mitigation Plans) requested from a Registered Entity is not received by the Required Date, ReliabilityFirst may sequentially execute a notification process for each Reliability Standard for which data has been requested. ReliabilityFirst will afford the Registered Entity reasonable opportunity to resolve any difficulty submitting data due to time or format issues. Failure to provide the requested data may result in an escalated violation of the referenced standard.

## **D. Monitoring Methods**

The Compliance Monitoring and Enforcement Program identifies eight monitoring processes to collect information to assess and make a determination of compliance: Compliance Audits, Self-Certifications, Spot Checking, Compliance Violation Investigations, Self-Reporting, Periodic Data Submittals, Exception Reporting, and Complaints. For a detailed explanation of each of these processes, refer to the “ReliabilityFirst Compliance Monitoring and Enforcement Program” document posted on the ReliabilityFirst website under the Compliance section. Compliance Audit, Self-Certification, Periodic Data Submittals, and Spot Checks are the primary methods used to monitor for compliance, although the other monitoring methods may be utilized during the year.

### **i. Compliance Audits**

ReliabilityFirst staff shall perform comprehensive Compliance Audits to verify compliance with the Reliability Standards. Reliability Coordinators, Balancing Authorities, Transmission Operators, Transmission Owners, and Local Control Centers will be audited on a three cycle. All other entities will be audited on a six year cycle. Compliance Audits can be conducted at any time due to a specific event, special circumstance, or as requested by the ReliabilityFirst Board. The PCC shall be the responsible party to disseminate audit materials, and coordinate agendas and schedules on behalf of the Registered Entity.

The long range audit plan is to maintain the three year and six year audit cycles. In an effort to separate the compliance audits and NERC readiness evaluations by approximately 18 months, we have and will adjust these schedules accordingly. There may be some schedule adjustments that exceed the three year calendar dates, but we would limit that to no more than four months. Some adjustments could result in a slightly less than three year cycle. The transition to an 18 month separation between compliance audits and NERC readiness evaluations should be resolved within six years.

ReliabilityFirst shall conduct Compliance Audits with staff and contractors as needed. All audit team participants will have completed the required NERC Auditor Training course. Compliance Audits will utilize tools and process developed in conjunction with NERC to provide consistency in the audit process. ReliabilityFirst shall follow the Compliance Audit process as outlined in the ReliabilityFirst CMEP.

All Registered Entities are subject to being audited for compliance with all Reliability Standards applicable to the function(s) for which they are registered. All Compliance

Audits shall be conducted in accordance with audit guides and protocols established for the Reliability Standards by NERC. At the end of each audit the entity will be asked to provide feedback on the process and any other concerns they may have with the audit.

## **ii. Self Certification**

Self-Certification is applied to a specific set of Reliability Standards. A Self-Certification for a Reliability Standard shall be submitted using CDMS. The PCC will be attesting to the validity of these Self-Certification submittals for each respective submittal. Reliability*First* does not require any supporting data to be submitted at the time of the Self-Certification. These submittals will be monitored for timeliness and compliance to the standard.

Reliability*First* staff may request data and other information to be made available to support an assessment. The Reliability*First* staff will then review, assess, and determine the final status of compliance. Validation may also be performed via Audits and/or Spot Checks.

## **iii. Self Reporting**

Self-Reporting is an important compliance monitoring process through which a registered entity reports any violation that it detects itself thru self-assessment or becomes aware of during their daily operations. A Self-Report is initiated by the registered entity and may be submitted at any time. A Self-Report for a Reliability Standard shall be submitted using CDMS.

Reliability*First* will review the information to determine compliance with the Reliability Standards. Reliability*First* may request clarification or additional data and/or information from the registered entity to ensure that the deficiency is sufficiently described in enough detail to enable staff to assess the violation, assure no additional violations of other standards or requirements are implicated by the violating act, and assess approval of a mitigation plan.

## **iv. Periodic Data Submittals**

Reliability*First* will require Periodic Data Submittals in accordance with an established schedule to satisfy Reliability Standard requirements, as part of an investigation, or at any other time it may be necessary to determine compliance. This may include, but not limited to, data for modeling, studies, analyses, documents, procedures, methodologies, operating data, and process information which may be necessary to support the assessment of compliance with Reliability Standards. Reliability*First* will provide notice to the Registered Entities of Periodic Data Submittal requirements with specific requests or as presented in Attachment A.

Typically, Periodic Data Submittal consists of monthly, quarterly, and annual data submittals. These submittals will be monitored for timeliness and compliance.

**v. Spot Checking**

Spot Checks will be conducted by *ReliabilityFirst*. Spot Checks will be used to address trends in negative performance of compliance identified from past compliance statistics. Spot Checks may be initiated by *ReliabilityFirst* at any time to verify or confirm Self-Certifications, Self Reporting, and Periodic Data Submittals. Spot Checks may also be random or, may be initiated in response to operating problems or system events as described in the Reliability Standards. *ReliabilityFirst* will review the information submitted to verify the Registered Entity's compliance with the Reliability Standard.

**vi. Complaints & Compliance Violation Investigations**

*ReliabilityFirst* will conduct a review of each Complaint it receives to determine if the Complaint provides sufficient basis for a Compliance Violation Investigation. If, as a result of the initial review of the Complaint, *ReliabilityFirst* determines that a Compliance Violation Investigation is warranted, a Compliance Violation Investigation will be conducted.

Compliance Violation Investigations will generally be led by the *ReliabilityFirst* staff and may include NERC staff. Compliance Violation Investigations will be confidential, unless FERC directs that a Compliance Violation Investigation should be public or that certain information obtained in the Compliance Violation Investigation should be publicly disclosed.

If *ReliabilityFirst* concludes that a reasonable basis exists for believing a violation of a Reliability Standard has occurred, it shall send the Registered Entity a notice containing the information set forth and initiate the Notice of Alleged Violation Process.

**E. Documentation and Evidence**

The burden of proof to show compliance to the Reliability Standards lies with the registered entity during any compliance monitoring process. Documentation supporting compliance to a particular standard and requirement shall be clearly and specifically identified by the registered entity. The evidence submitted by the registered entity needs to be both sufficient and appropriate in order for a finding of compliance to be determined. Appropriateness is the measure of the quality of evidence that encompasses the relevance, validity, and reliability of evidence used for supporting findings and conclusions. Evidence is sufficient when enough evidence has been obtained to persuade a knowledgeable person that the findings are reasonable.

**4) Enforcement and Mitigation**

*ReliabilityFirst* shall determine (i) whether there have been alleged violations of Reliability Standards by Registered Entities, and (ii) if so, the appropriate remedial actions, penalties, and sanctions to impose as prescribed in the NERC Sanction Guidelines.

If *ReliabilityFirst* determines a Registered Entity has an alleged compliance violation, *ReliabilityFirst* will issue a notice of alleged violation and subsequent penalty determination. The Registered Entity can either confirm and accept or contest the alleged violation and or penalty.

If the Registered Entity confirms and accepts the finding, the Registered Entity shall file a Mitigation Plan to correct the violation in accordance with the CMEP. Upon acceptance of the mitigation plan by ReliabilityFirst, the entity shall be monitored to ensure progress is proceeding towards completion of the plan.

If the Registered Entity contests the finding, it can precede to the ReliabilityFirst Hearing Process.

#### **A. Hearing Process**

The Hearing Process that can be found on the ReliabilityFirst web site shall be available to a Registered Entity to contest an alleged violation, penalty, sanction, mitigation plan requirement, or remedial action directive. The hearing body shall issue a decision at the conclusion of the hearing and provide a report to the Registered Entity and NERC consistent with the delegation agreement.

#### **B. Settlement**

ReliabilityFirst has adopted a Settlement Procedure that can be found on the ReliabilityFirst web site. A settlement may be negotiated and reached at any time prior to the issuance of a Notice of Alleged Violation until a Notice of Penalty is filed with FERC.

#### **C. NERC Appeal Process**

The Registered Entity may appeal the hearing body's decision to NERC, as provided for in NERC Rules of Procedure.

### **5) Organization Registration Process**

#### **A. Organization Registration**

As specified under ReliabilityFirst's Delegation Agreement with NERC, ReliabilityFirst will continue to register organizations responsible for complying with Reliability Standards in accordance with Section 500 of the NERC Rules of Procedure. ReliabilityFirst will identify the owners, operators, and users of the bulk power system that meets the definition of Registered Entities within ReliabilityFirst's area of responsibility.

Forms to register organizations and revise existing organization registrations will be available on the ReliabilityFirst website.

ReliabilityFirst will develop, maintain, and provide to NERC a ReliabilityFirst Compliance Registry with updates as changes occur to the registry.

#### **B. Registration Appeals**

A registered entity may choose to appeal a decision by ReliabilityFirst to include or retain a registered entity on the ReliabilityFirst Compliance Registry. The registered entity must notify the ReliabilityFirst Compliance Staff in writing or by transmittal of an electronic document that it disputes the registration. The notification should include a description of facts that supports

the entity's position. The ReliabilityFirst Compliance Staff will review the dispute, including the Entity's supporting documentation. The ReliabilityFirst Compliance Staff will use technical support and judgment based on the information provided for this evaluation.

The ReliabilityFirst Compliance Staff will make an initial determination on the registration dispute. If the initial determination of the ReliabilityFirst Compliance Staff is in agreement with the entity, the entity will be notified in writing or by transmittal of an electronic document and the process is complete. ReliabilityFirst will notify NERC of any registration changes.

If the ReliabilityFirst Compliance Staff does not accept the position of the entity, the entity will be notified in writing or by transmittal of an electronic document of the initial determination and the supporting basis for the decision. If the entity chooses to advance the appeal, they must submit a registration appeal to NERC.

## **6) Compliance Program Supporting Documentation**

Reliability Standards and all applicable compliance information are available on the ReliabilityFirst web pages. (<http://www.rfirst.org>).

**Attachment A - 2008 Compliance Monitoring Schedule**

**Attachment B - 2008 Compliance Audit Schedule**

**Attachment C - 2008 NERC Readiness Evaluation Schedule**

## **7) Communications**

Communication of Compliance Activities Include:

A. Monthly Newsletter

The ReliabilityFirst Newsletter provides entities with news and information relating to ReliabilityFirst compliance activities.

B. Monthly Update Letter

The ReliabilityFirst Monthly Update Letter provides entities with notification of submittal due dates of materials necessary to satisfy compliance to the Reliability Standards. Includes present and next month's requirements.

C. ReliabilityFirst web site

The ReliabilityFirst website provides compliance and technical materials needed to support compliance program implementation.

D. Compliance Workshops/Seminars

ReliabilityFirst Compliance workshops or seminars, which will include NERC and FERC related initiatives, will be scheduled following final approval of the CMEP.

2008 COMPLIANCE MONITORING SCHEDULE

RELIABILITY STANDARDS SUBJECT TO COMPLIANCE MONITORING BY ALL REGISTERED ENTITIES  
REVISION 0 - JANUARY 1, 2008

**ABBREVIATIONS**

BA - Balancing Authority  
DP - Distribution Provider  
GO - Generation Owner  
GOP - Generation Operator  
IA - Interchange Authority  
LSE - Load-Serving Entity  
PA - Planning Authority  
PRSG - Planning Reserve Sharing Group  
PSE - Purchasing-Selling Entities

RC - Reliability Coordinator  
RP - Resource Planner  
RE - Regional Entity  
RSG - Reserve Sharing Group  
TO - Transmission Owner  
TOP - Transmission Operator  
TP - Transmission Planner  
TSP - Transmission Service Provider

AT - Assessment  
D/S - Data Submittals  
E/R - Exception Reporting  
I - Investigation  
S/C - Self-Certification  
S/R - Self-Report at time of occurrence  
TBD - To be Determined

X Changes since last Revision  
The highlighted Standards are subject to 48-Hour Reporting to NERC upon ReliabilityFirst being notified.  
Monitored but not subject to penalties

Reliability Standard	Title	Requirements Monitored	Functions Monitored	Type of Monitoring for 2008	Date Due
<b>RESOURCE AND DEMAND BALANCING</b>					
BAL-001-0	Real Power Balancing Control Performance (CPS 1)	All	BA	D/S	Due to ReliabilityFirst on the 15th of each month
	Real Power Balancing Control Performance (CPS 2)				
BAL-002-0	Disturbance Control Performance (DCS)	All	BA, RE, RSG	D/S	Due to ReliabilityFirst quarterly, on the 15th of the following month
BAL-003-0	Frequency Response and Bias	All	BA	E/R	Upon Discovery
BAL-004-0	Time Error Correction	All	BA, RC	I	(I)
BAL-005-0	Automatic Generation Control	All	BA, GOP, LSE, TOP	I	(I)
BAL-006-1	Inadvertent Interchange	All	BA	S/C	Due to ReliabilityFirst on the 15th of each month
<b>CRITICAL INFRASTRUCTURE PROTECTION</b>					
CIP-001-1	Sabotage Reporting	All	BA, GOP, LSE, RC, TOP	S/C	9/26/2008
CIP-002-1	Critical Cyber Asset Identification	R1, R2, R3	BA, TOP, RC	S/C	9/10/2008
CIP-003-1	Security Management Controls	R1, R2, R3		S/C	9/10/2008
CIP-004-1	Personnel & Training	R2, R3, R4		S/C	9/10/2008
CIP-007-1	Systems Security Management	R1		S/C	9/10/2008
CIP-008-1	Incident Reporting and Response Planning	R1		S/C	9/10/2008
CIP-009-1	Recovery Plans for Critical Cyber Assets	R1, R2		S/C	9/10/2008
CIP-003-1	Security Management Controls	R2	TP, BA, TOP	S/C	9/26/2008
CIP-003-1	Security Management Controls (Effective 12/31/2008)	R2	IA, TSP, TO, GO, GOP, LSE, RE	S/C	1/15/2009
<b>COMMUNICATIONS</b>					
COM-001-1	Telecommunications	R2 & R5	BA, RC, TOP	S/C	3/28/2008
COM-002-2	Communications and Coordination	All	BA, GOP, RC, TOP	S/C	3/28/2008
<b>EMERGENCY PREPAREDNESS AND OPERATIONS</b>					
EOP-001-0	Emergency Operations Planning	All	BA, TOP	S/C	3/28/2008
EOP-002-2	Capacity and Energy Emergencies	All	BA, RC	S/C	3/28/2008
EOP-003-1	Load Shedding Plans	All	BA, TOP	S/C	3/28/2008
EOP-004-1	Disturbance Reporting	All	BA, GOP, LSE, RC, RE, TOP	S/C	9/26/2008
EOP-005-1	System Restoration Plans	All	BA, TOP	S/C	6/27/2008
EOP-006-1	Reliability Coordination - System Restoration	All	RC	S/C	3/28/2008
EOP-008-0	Plans for Loss of Control Center Functionality	All	BA, RC, TOP	S/C	6/27/2008
EOP-009-0	Documentation of Blackstart Generating Unit Test Results	All	GO, GOP	S/C	6/27/2008
<b>FACILITIES DESIGN, CONNECTIONS AND MAINTENANCE</b>					
FAC-003-1 <sup>1</sup>	Transmission Vegetation Management Program	All	TO, RE	S/C	6/27/2008
	Quarterly Vegetation Outage Report			S/R	On Occurrence and on the 20th of the following month
FAC-008-1	Facility Ratings Methodology	All	GO, TO	S/C	06/27/2008
FAC-009-1	Establish and Communicate Facility Ratings	All	GO, TO	S/C	06/27/2008
FAC-013-1	Establish and Communicate Transfer Capabilities	All	PA, RC	S/C	06/27/2008

2008 COMPLIANCE MONITORING SCHEDULE

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 I - Investigation  
 S/C - Self-Certification  
 S/R - Self-Report at time of occurrence  
 TBD - To be Determined

- Changes since last Revision
- The highlighted Standards are subject to 48-Hour Reporting to NERC upon ReliabilityFirst being notified.
- Monitored but not subject to penalties

Reliability Standard	Title	Requirements Monitored	Functions Monitored	Type of Monitoring for 2008	Date Due
<b>INTERCHANGE SCHEDULING AND COORDINATION</b>					
INT-001-2	Interchange Transaction Tagging	All	BA, PSE	S/C	9/26/2008
INT-003-2	Interchange Transaction Implementation	All	BA	S/C	9/26/2008
INT-004-1	Interchange Transaction Modifications	All	BA, PSE, RC, TOP	D/S	9/26/2008
<b>INTERCONNECTION RELIABILITY OPERATIONS AND COORDINATION</b>					
IRO-001-1 <sup>2</sup>	Reliability Coordinator Responsibilities & Authority	All	BA, GOP, LSE, PSE, RC, RE, TOP, TSP	S/C	9/26/2008
IRO-003-2	Reliability Coordinator - Wide Area View	All	RC	S/C	3/28/2008
IRO-004-1	Reliability Coordination — Operations Planning	All	BA, GO, GOP, LSE, RC, TO, TOP, TSP	S/C & E/R	9/26/2008 (S/C) & Upon Discovery
IRO-005-1	Reliability Coordination — Current Day Operations	All	RC, BA, TOP, TSP, GOP, LSE, PSE	S/C	9/26/2008
IRO-006-3	Reliability Coordination Transmission Loading Relief	All	BA, RC, TOP	I	(I)
IRO-014-1	Procedures, Processes, or Plans to Support Coordination between Reliability Coordinators	All	RC	S/C	3/28/2008
IRO-015-1	Notifications and Information Exchange between Reliability Coordinators	All	RC	S/C	3/28/2008
IRO-016-1	Coordination of Real-time Activities between Reliability Coordinators	All	RC	S/C	3/28/2008
<b>MODELING, DATA AND ANALYSIS</b>					
MOD-010-0	Steady-State Data for Transmission System Modeling & Simulation	All	GO, RP, TO, TP		
	Tie Line Data			D/S	TBD
	Interchange Data			D/S	TBD
	Data Set I - 2009 Light Load, 2009 Summer, 2009/10 Winter, 2010 Summer, 2010/11 Winter, 2014 Summer, 2014/15 Winter				
	Initial Raw Data			D/S	TBD
	Case Changes			D/S	TBD
	Data Set II - 2009 Spring, 2009 Fall, 2010 Spring, 2010 Fall, 2019 Summer				
	Initial Raw Data			D/S	TBD
Case Changes	D/S	TBD			
MOD-012-0	Dynamics Data for Transmission System Modeling and Simulation	All	GO, RP, TO, TP	D/S	TBD
MOD-017-0	Aggregated Actual and Forecast Demands and Net Energy for Load— Monthly Demand	All	LSE, PA, RP	D/S	02/15/2008
	Aggregated Actual Demands and Net Energy for Load— Annual Hourly Load				4/4/2008
MOD-019-0	Forecasts of Interruptible Demands and Direct Control Load Management (DCLM) Data	All	LSE, PA, RP, TP	D/S	02/15/2008
<b>PERSONNEL PERFORMANCE, TRAINING AND QUALIFICATIONS</b>					
PER-002-0	Operator Personnel Training	All	BA, TOP	S/C	9/26/2008
PER-003-0	Operator Personnel Credentials	All	BA, RC, TOP	E/R	Upon Discovery
PER-004-1	Reliability Coordination Staffing	All	RC	S/C	3/28/2008
<b>PROTECTION AND CONTROL</b>					
PRC-004-1	Analysis and Mitigation of Transmission and Generation Protection System Misoperation	All	DP, GO, TO	D/S	4/30/2008
PRC-005-1	Transmission and Generation Protection System Maintenance and Testing	All	DP, GO, TO	S/C	9/26/2008
PRC-008-0	Underfrequency Load Shedding Equipment Maintenance Programs	All	DP, TO	S/C	9/26/2008
PRC-010-0	Assessment of the Design and Effectiveness of UVLS Program	All	DP, LSE, TO, TOP	S/C	6/27/2008
PRC-011-0	UVLS System Maintenance and Testing	All	DP, TO	S/C	9/26/2008
PRC-016-0	Special Protection System Misoperations	All	DP, GO, TO	D/S	4/30/2008
PRC-017-0	Special Protection System Maintenance and Testing	All	DP, GO, TO	S/C	9/26/2008
PRC-021-1	Under-Voltage Load Shedding Program Data	All	DP, TO	S/C	9/26/2008

2008 COMPLIANCE MONITORING SCHEDULE

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- Changes since last Revision
- The highlighted Standards are subject to 48-Hour Reporting to NERC upon ReliabilityFirst being notified.
- Monitored but not subject to penalties

Reliability Standard	Title	Requirements Monitored	Functions Monitored	Type of Monitoring for 2008	Date Due
<b>TRANSMISSION OPERATIONS</b>					
TOP-002-2	Normal Operations Planning	All	BA, GOP, LSE, TOP, TSP	S/C & I	3/28/2008
TOP-003-0	Planned Outage Coordination	All	BA, GOP, RC, TOP	S/C & I	3/28/2008 & ( 1 )
TOP-004-1 <sup>3</sup>	Transmissions Operations	All	TOP	S/C & I	3/28/2008 & ( 1 )
TOP-005-1	Operational Reliability Information	All	BA, PSE, RC, TOP	S/C & E/R	9/30/2008 (S/C) & Upon Discovery
TOP-007-0	Reporting SOL & IROL Violations Evaluation	All	RC, TOP	E/R	Upon Discovery
<b>TRANSMISSION PLANNING</b>					
TPL-001-0	System Performance Under Normal Conditions	All	PA, TP	S/C	11/20/2008
	Near Term - (Years One through Five)				
	Long Term - (Years Six through Ten)				
TPL-002-0	System Performance Following Loss of a Single BES Element	All	PA, TP	S/C	11/20/2008
	Near Term - (Years One through Five)				
	Long Term - (Years Six through Ten)				
TPL-003-0	System Performance Following Loss of Two or More BES Elements	All	PA, TP	S/C	11/20/2008
	Near Term - (Years One through Five)				
	Long Term - (Years Six through Ten)				
TPL-004-0	System Performance Following Extreme BES Events	All	PA, TP	S/C	11/20/2008
	Near Term - (Years One through Five)				
<b>VOLTAGE AND REACTIVE</b>					
VAR-001-1	Voltage and Reactive Control	All	PSE, TOP	S/C	8/31/2008
VAR-002-1	Generator Operation for Maintaining Network Voltage Schedules	All	GOP, GO	S/C & I	9/30/2008 & ( 1 )

Footnote:  
 1 48 Hour reporting for R3.4.1 and R3.4.2 only  
 2 48 Hour reporting for R8 and R9 only  
 3 48 Hour reporting for R4 only

**CRITICAL INFRASTRUCTURE PROTECTION SURVEY**

**CRITICAL INFRASTRUCTURE PROTECTION**

CIP-002-1	Critical Cyber Asset Identification	All*	RC, BA, IA, TSP, TO, TOP, GO, GOP, LSE,	SURVEY	7/1/2008
CIP-003-1	Security Management Controls	All*	RC, BA, IA, TSP, TOP, TOP, GO, GOP, LSE,	SURVEY	7/1/2008
CIP-004-1	Personnel & Training	All*	RC, BA, IA, TSP, TOP, TOP, GO, GOP, LSE,	SURVEY	7/1/2008
CIP-005-1	Electronic Security Perimeter(s)	All	RC, BA, IA, TSP, TOP, TOP, GO, GOP, LSE,	SURVEY	7/1/2008
CIP-006-1	Physical Security of Critical Cyber Assets	All	RC, BA, IA, TSP, TOP, TOP, GO, GOP, LSE,	SURVEY	7/1/2008
CIP-007-1	Systems Security Management	All*	RC, BA, IA, TSP, TOP, TOP, GO, GOP, LSE,	SURVEY	7/1/2008
CIP-008-1	Incident Reporting and Response Planning	All*	RC, BA, IA, TSP, TOP, TOP, GO, GOP, LSE,	SURVEY	7/1/2008
CIP-009-1	Recovery Plans for Critical Cyber Assets	All*	RC, BA, IA, TSP, TOP, TOP, GO, GOP, LSE,	SURVEY	7/1/2008

\* Except Requirements Monitored on Page 1



**Attachment B  
2008 COMPLIANCE AUDIT SCHEDULE**

**3 YEAR AUDIT CYCLE  
AS OF 11/1/2007**

<b>The Weeks of</b>	<b>Registered Entity</b>	<b>Registered Functions</b>
Apr-28 to May-2	Potomac Electric Power Co.	TO, DP, LSE, PSE
May-19 to May-23	Atlantic City Electric, Delmarva Power and Light	TO, DP, LSE, PSE
Sep-15 to Sep-19	ITC, METC, MECS	BA, TOP, TO, TP
Sep-29 to Oct-3	Allegheny Power	TOP, TO, DP, RP, LSE, PSE
Oct-6 to Oct-9	Old Dominion Electric Cooperative	TO, RP, DP, GO, GOP, LSE, PSE
Oct-27 to Oct-31	American Transmission Systems - First Energy at Reading	BA, TOP, TO, TP
Nov-10 to Nov-14	NIPSCO	BA, TOP, TO TP, RP, DP, GO, GOP, LSE, PSE
Nov-17 to Nov-21	PSEG	TO, DP, LSE

**6 YEAR AUDIT CYCLE  
AS OF 11/1/2007**

<b>The Weeks of</b>	<b>Registered Entity</b>	<b>Registered Functions</b>
Mar-10 to Mar-21	City of Rochelle	TO, DP, LSE
Mar-10 to Mar-21	City of Lansing by its Board of Water and Light	DP, LSE
Mar-10 to Mar-21	City of New Martinsville	GO, GOP
Mar-10 to Mar-21	Dynegy Inc.	GO, GOP
Mar-10 to Mar-21	Strategic Energy L.L.C.	LSE, PSE
Mar-10 to Mar-21	City of Radford, VA	DP
Mar-10 to Mar-21	City of Marshall	DP
Mar-10 to Mar-21	Adams Rural Electric Cooperative, Inc.	DP
Mar-10 to Mar-21	AES Beaver Valley L.L.C	GO
Mar-10 to Mar-21	AES Ironwood, LLC	GO
Mar-10 to Mar-21	Duquesne Light Energy LLC	LSE
Mar-10 to Mar-21	Citigroup Energy, Inc.	PSE
May-5 to May-16	Ohms Energy Company, LLC	RP, GOP, LSE, PSE
May-5 to May-16	Edison Mission Marketing & Trading, Inc.	GO, GOP, PSE
May-5 to May-16	Ohio Edison Company	DP, LSE
May-5 to May-16	Kincaid Generation, LLC	GO, GOP
May-5 to May-16	Liberty Electric Power, L.L.C.	GO, GOP
May-5 to May-16	Eagle Energy Partners I, L.P.	LSE, PSE
May-5 to May-16	South Central Power Co	DP
May-5 to May-16	City of Orrville, OH	DP
May-5 to May-16	City of Painesville	DP

**Attachment B**  
**2008 COMPLIANCE AUDIT SCHEDULE**

The Week Of	Registered Entity	Registered Functions
May-5 to May-16	LSP-Whitewater, LP	GO
May-5 to May-16	Duquesne Generation Company	GO
May-5 to May-16	South Jersey Energy	LSE
May-5 to May-16	Occidental Power Services, Inc.	PSE
May-5 to May-16	South Carolina Electric & Gas Company	PSE
May-5 to May-16	Duquesne Power LLC	PSE
Sep-2 to Sep-20	Easton Utilities Commission	DP, GO, GOP, LSE, PSE
Sep-2 to Sep-20	City of Vineland New Jersey	DP, GO, LSE, PSE
Sep-2 to Sep-20	Sugar Creek Power Company, LLC	GO, GOP, PSE
Sep-2 to Sep-20	Southern Maryland Electric Cooperative, Inc.	DP, LSE
Sep-2 to Sep-20	State Line Energy, LLC	GO, GOP
Sep-2 to Sep-20	East Coast Power Linden Holding LLC	GO, GOP
Sep-2 to Sep-20	City of Saint Marys	DP
Sep-2 to Sep-20	City of Shelby	DP
Sep-2 to Sep-20	Licking Rural Electrification, Inc.	DP
Sep-2 to Sep-20	Keystone Power LLC	GO
Sep-2 to Sep-20	Keystone Urban Renewal, LP	GO
Sep-2 to Sep-20	Liberty Power Corp.	LSE
Sep-2 to Sep-20	Dynegy Power Marketing, Inc.	PSE
Sep-2 to Sep-20	Omaha Public Power District	PSE
Sep-2 to Sep-20	Ontario Power Generation Inc.	PSE
Oct 13 to Oct-24	Ontelaunee Power Operating Company, LLC	GO, GOP, PSE
Oct 13 to Oct-24	Edison Sault Electric Company	DP, LSE
Oct 13 to Oct-24	SUEZ Energy Generation NA, Inc.	GO, GOP
Oct 13 to Oct-24	Ebensburg Power Company	GO, GOP
Oct 13 to Oct-24	City of Westerville Electric Division	DP
Oct 13 to Oct-24	Logan County Cooperative Power & Light Association, Inc.	DP
Oct 13 to Oct-24	City of Columbus Ohio	DP
Oct 13 to Oct-24	Lincoln Generating Facility, LLC	GO
Oct 13 to Oct-24	LSP-Whitewater I, Inc.	GOP
Oct 13 to Oct-24	Liberty Power Maryland, L.L.C.	LSE
Oct 13 to Oct-24	SUEZ Energy Resources NA, Inc.	PSE
Oct 13 to Oct-24	City Power Marketing, LLC	PSE
Oct 13 to Oct-24	DTE Energy Trading, Inc.	PSE
Oct 13 to Oct-24	KeyTex Energy, LLC	PSE



**ATTACHMENT C**  
**2008 NERC READINESS EVALUATION SCHEDULE**  
**AS OF 11/1/2007**

The Week of	Registered Entity	Registered Functions
Apr-21 to Apr-25	ITC, METC, MECS	BA, TOP, TO, TP
Apr-28 to May 2	Old Dominion Electric Cooperative	TO, RP, DP, GO, GOP, LSE, PSE
May-5 to May-9	NIPSCO	BA, TOP, TO TP, RP, DP, GO, GOP, LSE, PSE
May-19 to May-23	American Transmission Systems - First Energy at Reading	BA, TOP, TO, TP
Oct-6 to Oct-10	Potomac Electric Power Co.	TO, DP, LSE, PSE
Oct-13 to Oct-17	Vectren Energy Delivery of Indiana	BA, TOP, TO TP, RP, DP, GO, GOP, LSE, PSE
Nov-3 to Nov-7	Hoosier Energy	BA, TOP, TO TP, RP, DP, GO, GOP, LSE, PSE
Nov-17 to Nov-21	Dayton Power and Light	TO, RP, DP, GO, GOP, LSE, PSE