

# NERC

NORTH AMERICAN ELECTRIC  
RELIABILITY CORPORATION

## Compliance Monitoring and Enforcement Program

### 2008 Implementation Plan

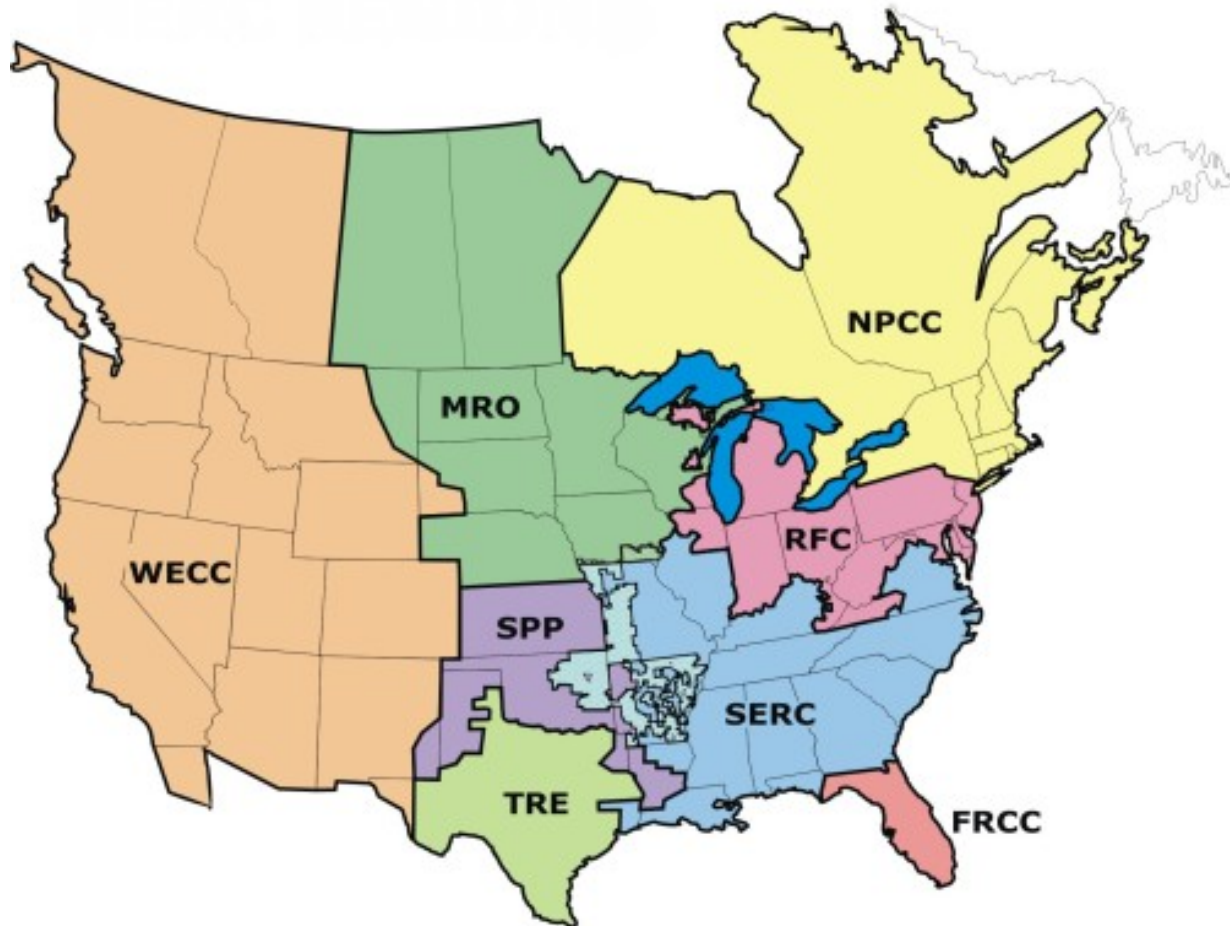
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## NERC COMPLIANCE MONITORING AND ENFORCEMENT PROGRAM

The NERC Compliance Monitoring and Enforcement Program (CMEP) is designed to improve reliability through the effective and efficient enforcement of reliability standards. NERC has organized the program in four areas:

- Registration and Certification
- Regional Compliance Program Oversight
- Enforcement and Mitigation
- Compliance Reporting and Data Management

# INTRODUCTION

The NERC Compliance Monitoring and Enforcement Program Implementation Plan (Implementation Plan) is the strategic operating plan for annual compliance monitoring and enforcement activities to ensure NERC, as an international Electric Reliability Organization (ERO), and its regional entities fulfill their responsibilities under the legislation in the United States and other applicable obligations in other jurisdictions in Canada and Mexico. The compliance monitoring and enforcement activities are carried out by NERC and the eight regional entities based on the FERC-approved uniform Compliance Monitoring and Enforcement Program, the NERC Rules of Procedure, and their respective delegation agreements. This plan outlines the implementation basis for each regional entity to develop a respective 2008 regional entity annual implementation plan (regional entity plan) for consideration by NERC. All regional entities submit their 2008 annual plans to NERC for consideration by November 1, at which point NERC will review and subsequently approve the regional entity plans.

In the first quarter of 2008, NERC and the regional entities will develop their 2009 implementation plans to more effectively align with the budget development and approval cycle.

NERC staff developed the 2008 Implementation Plan, in consultation with regional entity staff based on the:

- NERC Rules of Procedure and Compliance Program
- Regional Entity Delegation Agreements
- NERC Board of Trustees and FERC approved reliability standards
- History of the compliance activities and findings
- Input from readiness evaluations and reliability performance

The objective of the Implementation Plan is to:

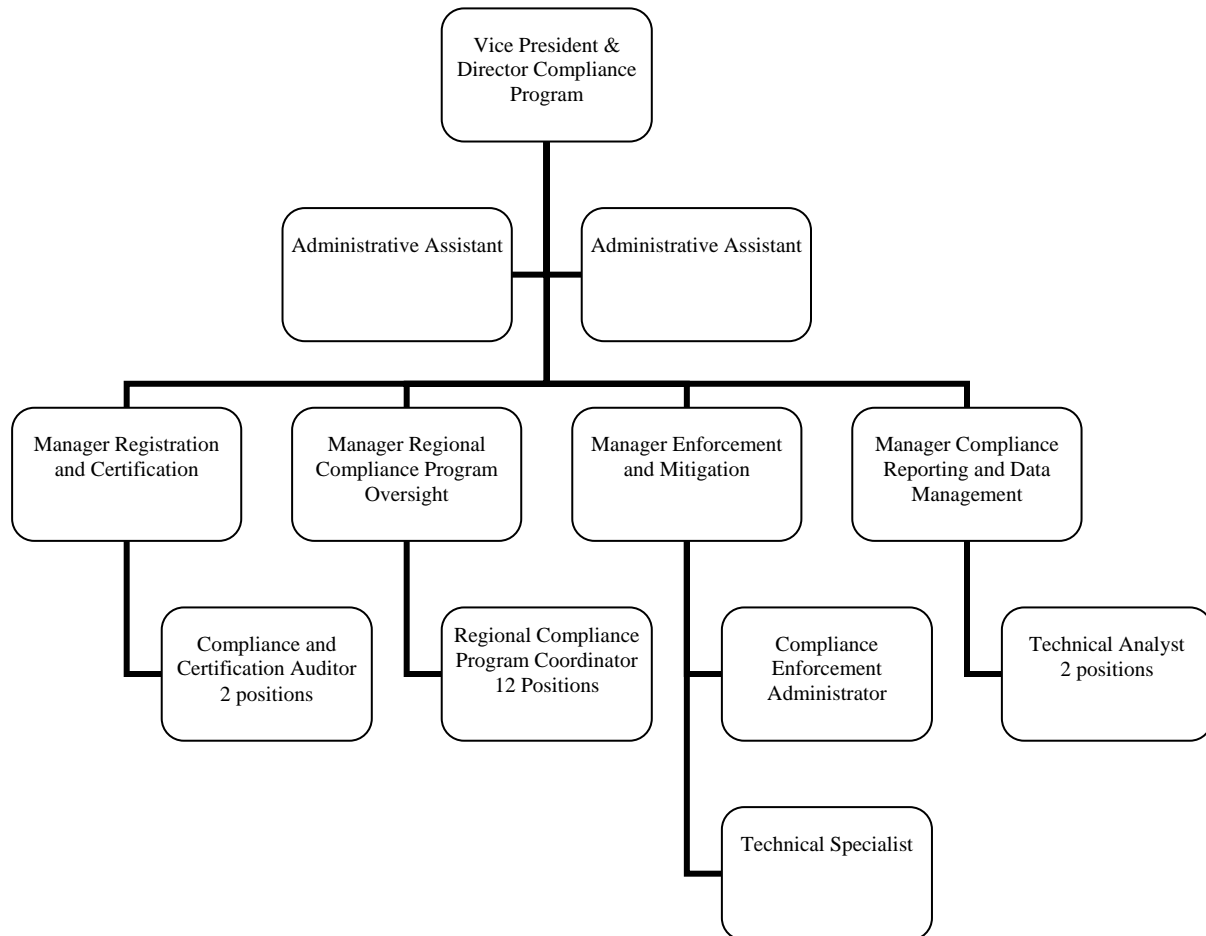
- Promote the reliability of the bulk power system through rigorous compliance monitoring and enforcement activities,
- Facilitate uniformity of compliance activities throughout North America, and
- Improve the compliance program by analyzing compliance monitoring experience across North America and implementing necessary improvements.

In 2008, NERC and the regional entities will shift focus from start-up implementation of the CMEP, as approved by the Federal Energy Regulatory Commission (FERC), to on-going monitoring, auditing, tracking of performance, and identifying deficiencies in the program. Compliance staff will work to resolve those deficiencies and adjust the program as experience is gained. Many of the plans described in this 2008 Implementation Plan reflect the re-focus described above.

## NERC COMPLIANCE MONITORING AND ENFORCEMENT PROGRAM ORGANIZATION

NERC's Compliance Monitoring and Enforcement Program is organized into four (4) strategic units. The four units include registration and certification (this area includes regional entity program audits), regional compliance program oversight, enforcement and mitigation, and compliance reporting and data management.

NERC's CMEP organization chart indicates the compliance staff in each of the four units.



## **1. Organization Registration, Certification, and Regional Entity Compliance Program Audits**

The FERC implementing rule (18 C.F.R. Part 39) and NERC's Rules of Procedure (Sections 400 and 500) require NERC to register the entities that are responsible for complying with reliability standards and to certify balancing authority (BA), transmission operator (TOP), and reliability coordinator (RC) functional entities. NERC's registration and certification staff oversees the delegated registration activities of the regional entities for these programs. The manager of registration and certification leads this effort establishing direction and processes for registration and certification activities, interfacing with the regional entities as they collectively determine the implementation activities, and policies that enable a successful entity registration and certification effort, and by responding to regulatory and other requirements.

### **1.1 Organization Registration**

NERC's Organization Registration Program is based on the functional entity data collected and provided by the eight regional entities as part of their delegated responsibility. This data is updated in the NERC Compliance Registry which is posted on the [NERC Web site](#) and provided on a monthly basis to FERC and other regulatory authorities as required. The NERC Compliance Registry is the list of owners, operators, and users of the bulk power system that are responsible for compliance with the NERC reliability standards. The procedure for operation of the Organization Registration Program is located in Appendix 5 of the Rules of Procedure Section 500.

### **1.2 Organization Certification**

An updated organization certification process will be implemented in the second quarter of 2008. This updated process will provide for initial certification of new RCs, BAs, and TOPs. For RCs, BAs, and TOPs that require certification prior to implementation of the updated process, the methods used in 2007 for determining initial certification will be used. Currently and newly certified RCs, BAs, and TOPs will maintain certification through compliance with the NERC reliability standards. Reliability standards for the certification of RCs, BAs, and TOPs have been under development to identify the requirements and processes for certification. These existing draft organizational certification standards are currently on hold pending field testing and will be incorporated into existing reliability standards and the new initial certification process as applicable.

### **1.3 Regional Entity Compliance Program Audits**

Audits of regional entity CMEP implementations will begin in the first quarter of 2008. Audits of a regional entity's compliance program performance are the responsibility of the Compliance and Certification Committee and are led by a Compliance and Certification Committee representative. NERC staff will participate in the audit and facilitate the audit process. FERC and other applicable governmental authority staff are expected to attend and have committed a minimum of one staff member as an observer for each audit team. NERC will audit each regional entity at least once every three years for adherence to its delegation agreement and NERC Rules of Procedure. A compliance program audit schedule for 2008–2010 will be posted by October 31, 2007 on NERC's Web site.

### **1.4 Registered Entity Standards Compliance Audits**

In conjunction with the three year regional entity CMEP program audits, NERC will establish a program to audit bulk power system owners, operators, and users that are operating within a regional entity to verify the findings of previous compliance audits conducted by the regional entity to evaluate how well the regional entity compliance enforcement program is meeting its delegated authority and responsibilities.

## **2. Regional Compliance Program Oversight**

### **2.1 Regional Entity Program Monitoring**

The Regional Compliance Program Oversight Group is led by the manager of regional compliance oversight, and it includes twelve regional compliance coordinator positions. To more effectively assist the regional entities and to monitor compliance activities, these coordinators are located throughout North America and work with the regions to assist them and facilitate uniform application of the program. Additionally, the coordinators are key resources with responsibilities such as: NERC audit lead, continued development of the *NERC Compliance Auditor Manual*, Reliability Standards Audit Worksheets (RSAWs), various auditor tools, auditor training, knowledge management initiatives, and regional entity and NERC performance tracking.

#### **2.1.1 Performance Measurement**

NERC holds weekly conference calls and monthly meetings with regional entity compliance managers to coordinate the activities of the program and achieve consistency in the application of the program. In addition, NERC has developed a series of metrics to monitor the performance of regional entity compliance program implementation. The metrics are tracked by the regional entities and submitted to NERC on a quarterly basis. These metrics assist NERC in monitoring performance issues such as timeliness, accuracy, and contribution to compliance program best practices, among other measures. These measures will guide NERC when it conducts audits of the regional entity compliance programs and carries out its responsibility for oversight of the regional entity programs. NERC will report the results of its measures to the regional entities and the NERC Board of Trustees on a quarterly basis and will submit annual results to FERC. NERC believes that the weekly calls and monthly meetings combined with performance metrics will facilitate a swift transition to a uniform application of the NERC Compliance Monitoring and Enforcement Program.

#### **2.1.2 Knowledge Management**

NERC recognizes that important information and knowledge is the key to consistency across regions and is not always captured in reports or data submittals. In addition to gathering information through data and reports as further described in Section 4 Reporting and Data Management, NERC developed a Knowledge Management Plan to capture experiences, best compliance practices, and other information that will improve the compliance program. In 2007, NERC began development of the database to support its Knowledge Management Plan. In 2008, NERC will work with the NERC information

technology department to design and implement a knowledge sharing Web site, best practice roundtables, and the development of a regional entity review team.

### **2.1.3 NERC Auditor Participation**

For 2008, NERC will increase its compliance monitoring staff to twelve regional program coordinators. This staffing level will allow NERC to provide a compliance program coordinator for each region with additional subject matter experts (such as critical infrastructure system experts) and one manager to assist with program implementation issues and compliance audits. NERC believes that combining compliance auditor skills with subject matter expertise will enhance NERC's and the regional entity's ability to monitor registered entities, as well as help achieve regional entity uniformity and consistency in conducting compliance activities.

When fully staffed, NERC regional coordinators plan to attend 90 percent of the onsite audits of registered entities conducted by the regional entities. However, NERC coordinators will target the focus of their monitoring oversight on the audits of those registered entities whose impact on the bulk power system is most significant. NERC regional coordinators will also:

- Visit regional entity compliance offices to assist and observe the application of the seven other monitoring methods listed in the Compliance Monitoring and Enforcement Plan.
- Provide observations from audits in the other regions and consolidate their observations to identify best practices or areas of improvement.

When requested by the regional entity, NERC auditors will take the leadership role on audits.

### **2.1.4 Audit Observation Task Force**

One of the most significant developments to increase uniformity was the creation of the Audit Observation Task Force. This group led by NERC regional program coordinators and comprised of auditors from all regions, shares their experiences and observations to: identify inconsistencies, recommend best practices, create useful tools, and improve overall compliance program performance.

## **2.2 2008 Monitoring Plan**

NERC has designated a subset of reliability standards for active compliance monitoring and reporting by the regional entities in their 2008 implementation plans. For these standards, active monitoring means that registered entities will be required to report compliance data or results for these standards to their regional entity during 2008, even if they are fully compliant. The Implementation Plan specifies the method of monitoring for each of the reliability standards included. Registered entities are required to comply with all approved reliability standards and requirements that apply to their registered function(s) regardless of whether the standard/requirements are included in the current year active compliance monitoring and reporting plan or not. Not all approved reliability standards are selected for active monitoring and scheduled compliance reporting each

year. Regardless of whether the standard is included for active compliance monitoring or not, violations of any reliability standard should be promptly self-reported to the appropriate regional entity or to NERC. Further, NERC or the regional entities may request information to determine compliance with any approved reliability standard at any time. The eight regional entities, in their respective roles as compliance enforcement authorities, implement the plan in accordance with principals and processes documented in the NERC Compliance Monitoring and Enforcement Program. In addition, each compliance enforcement authority may include additional approved reliability standards in its annual plan.

### **2.3 Standards Monitored**

NERC enlisted the assistance of compliance program and technical experts from the regional entities to provide their insights during the selection of the reliability standards included in the 2008 program for active compliance monitoring and reporting. Once the initial group of standards was selected, NERC circulated the list to the compliance managers from each region, received comments, and finalized the actively monitored list for 2008. The standards in the 2008 program and the method of monitoring for each standard may be found on the [NERC Web site](#).

### **2.4 Regional Entity Schedules**

Each regional entity is required to submit its 2008 regional entity plan to NERC by November 1, 2007. Each regional entity plan includes a schedule of compliance audits and the identity of the entity scheduled for audit. A consolidated schedule of the planned compliance audits in the eight regions can be found on the [NERC Web site](#). NERC reviews and approves the regional entity plans in December 2007. Audits of entities that are not required by the NERC Rules of Procedure to receive compliance audits every three years will be audited on an every six-year rotation beginning in 2008.

To achieve the most efficient use of resources for both the compliance staff and the registered entities, NERC has initiated a task force to coordinate compliance audits of registered entities whose facilities are registered in multiple regions.

### **2.5 Auditor Training**

For audits conducted after January 1, 2008, the NERC Compliance Monitoring and Enforcement Program requires each audit team member to complete all NERC or NERC-approved auditor training applicable to the compliance audit. Common auditor training will facilitate uniformity across the regions. NERC has implemented instructor-led courses for lead auditors that are delivered to the regional entities on a regular basis. These training sessions are held in central locations for regional entity staff and their contractors. NERC will also provide self-paced training (at the request of a regional entity) for other audit team members, such as industry volunteers.

The Government Accountability Office (GAO) recently updated its auditing standards and requirements from Chapters 1–3, 7, and 8 of the June 2006 proposed revision have been initially included in both the instructor-led and self-paced courses. NERC will incorporate future revisions of the government auditing standards as they become available. Requirements from similar organizations in Canada or international

organizations may also be included in the near future.

The compliance auditor training program covers the topics listed below:

- Compliance audit process
- Overview of reliability standards and RSAWs
- Instruction of key auditor “soft” skills including how to conduct interviews, team management, and audit planning
- Discussion of legal considerations, such as protocols, confidentiality, code of ethics, background checks, and security issues

In addition to the training described above, NERC will provide more in depth auditor skills training as well as event driven situational training modules.

### **2.6 Audit Program Requirements**

CMEP compliance audits have been designed to meet or exceed the initial GAO requirements such as: significance, sufficient/appropriate evidence, audit planning, objectives, scope, methodology, internal control, and reporting. In addition to auditor training, NERC and the regional entities have developed the *NERC Compliance Auditor Manual* that describes fully the compliance audit requirements and procedures.

In 2007 the GAO was revised and NERC prepared a gap analysis to identify areas that required changes. Each regional entity was asked to identify deficiencies in its own program implementation as well as a schedule to remedy such deficiencies.

#### **2.6.1 Advance Preparations (Pre-audit Processes)**

During the pre-audit process, an overall program audit schedule, audit plan, information package and questionnaire will be provided to the registered entity. The registered entity is required to provide certain data and information to the regional entity which in turn will be provided to the audit team in advance of the site visit. RSAWs are provided to the registered entity in advance of the audit. The RSAWs assist the registered entity in its preparation for providing the audit team the evidence needed while on-site and helps to educate the registered entity on documentation requirements.

#### **2.6.2 Site Visit**

The CMEP audit team meets with registered entity personnel at the beginning of the site visit. The audit plan/process is discussed during the opening meeting. The team leader discusses the difference between compliance audits and readiness evaluations, audit objectives, audit scope, confidentiality issues, and how the audited entity will be evaluated. The majority of the site visit consists of the team interviewing entity staff and performing documentation evaluation to assist the team in making the performance assessments. The site visit ends with an exit presentation discussing preliminary findings, requesting audit feedback, detailing the audit results, and identifying the process going forward. After the site visit, additional performance phase or field work may be warranted.

### **2.6.3 Post Audit Process and Reporting**

The audit team prepares the draft audit report and provides it to the registered entity for review and comment. After completing a round of comments, the audit team submits the final audit report to the regional entity. Additionally, the audit team members and the registered entity complete audit evaluation forms which are submitted to the regional entity compliance manager and NERC. The information gathered from these evaluation forms is reviewed to determine the effectiveness of the audit process.

### **2.7 Compliance Education and Compliance Incentives for Registered Entities**

For the 2008 program, NERC and the regional entities will implement a series of compliance seminars, panel discussions, and compliance training classes beginning in the last quarter of 2007 to educate registered entities and further increase the reliability of the bulk power system through aggressive education and knowledge sharing.

NERC recognizes that the most powerful compliance incentives are public disclosure/recognition and monetary impact. The structure of penalty collection and regional entity budget offsets ensures that companies who have violated a reliability standard subsidize the costs of compliance monitoring for those who have not violated a reliability standard. Additionally, to recognize entities who achieve exemplary compliance records, NERC and the regional entities will implement a recognition program. Public recognition will be given at NERC and regional entity seminars. NERC will actively relay such recognition information to industry publications and will post the name of registered entities who achieve such recognition on the NERC Web site. Such industry compliance leaders will be asked to share their program best practices in future seminars.

## **3. Compliance Enforcement and Mitigation**

The CMEP articulates how sanctioning will be undertaken by NERC and the regional entities to financially or otherwise penalize owners, operators, and users of the bulk power system for violations of the reliability standards. The CMEP also directs how these owners, operators, and users will remedy their violations through the mandatory preparation and implementation of formal ERO-approved mitigation plans.

NERC's Enforcement and Mitigation Group, led by the manager of enforcement and mitigation, will review and facilitate NERC approval of all settlements, monetary penalties, and non-monetary sanctions determined by the regional entities to sanction bulk power system owners, operators, and users for violations of the reliability standards. The group will also review, facilitate NERC approval, and monitor the associated mitigation plans accepted from these owners, operators, and users by the regional entities.

The group developed and maintains a penalty determination framework tool ("penalty tool") that NERC and the regional entities will utilize in determining appropriate settlements, penalties and sanctions, and which the regional entities will use to document their work to NERC.

### **3.1 Mitigation of Violations**

The CMEP lays out the minimum required elements of mitigation plans and how regional entities will work with the registered entities to ensure all required elements are included in an approved mitigation plan. The Enforcement and Mitigation Group will facilitate NERC review of these plans and be the conduit for NERC approving and providing the plans to applicable governmental authorities.

### **3.2 Mitigation Tracking**

In 2008, the Enforcement and Mitigation Group will complete development and implementation of an appropriate monitoring and tracking system that will provide NERC a clear indication of the status of any mitigation plan at any point in time. Using information collected and provided to NERC by the regional entities, the system will assist NERC in ensuring, through the regional entities, that mitigation plans are undertaken and completed to scope and within schedule in a timely, documented, thorough, and effective manner, from conception to completion.

### **3.3 Enforcement**

As discussed and directed in applicable legislation and other documents, the CMEP and related agreements, NERC is to oversee and provide guidance to regional entities regarding sanctioning activities, such as the determination of acceptable settlements or appropriate penalties or sanctions in the United States pursuant to the NERC Sanctions Guidelines. The Enforcement and Mitigation Group carries primary responsibility for this oversight and guidance at NERC. The group will carry out this responsibility as discussed and directed in the CMEP.

The Enforcement and Mitigation Group has developed a “penalty tool” that is designed to: (i) provide consistent guidance to NERC and regional entity staff regarding the thorough and complete determination of settlements, penalties, and sanctions, pursuant to the NERC Sanctions Guidelines, for violations of the reliability standards in the United States, and; (ii) facilitate NERC analysis and ERO oversight of these sanction determinations.

In its “Order on Compliance Filing,” in Docket No. RR06-1-003, FERC ordered that NERC must provide any tools, such as the “penalty tool,” to FERC for review prior to implementation. NERC has submitted the “penalty tool” to FERC staff for its review, in accordance with the order, to ensure that the tool may be utilized as early as practicable in 2008.

### **3.4 Violation and Sanctioning Tracking**

NERC must perform its own tracking and monitoring of a violation and associated sanctioning developments and outcomes (*e.g.*, progress towards settlement, completion of the determination of appropriate penalty or sanction) in/at the regional entities in order to fulfill its ERO oversight role of these activities. Using information collected and provided to NERC by the regional entities, the Enforcement and Mitigation Group will complete development of an appropriate monitoring and tracking system necessary to (i) afford NERC a clear indication of the actual and projected status of any given violation

and its associated sanctioning proceeding at any point in time, and (ii) facilitate NERC analysis of these activities for violations, both individually and in aggregate. The system will be completed and in service as early as practicable by or before early 2008.

### **3.5 Violation Reporting & Interfacing with FERC**

In the United States, NERC reports and interfaces with FERC regarding all violations of the mandatory reliability standards. The CMEP discusses and describes how and when violation and mitigation plan information will be reported and interchanged between NERC and FERC. The Enforcement and Mitigation Group is responsible for undertaking the ERO-FERC violation reporting and information interchange identified in the CMEP.

Numerous protocols, procedures, and reporting forms are required by NERC and FERC to facilitate required violation reporting and information interchange in a manner that is timely, effective, and conforming to relevant requirements and legislation such as EPCRA 2005 and FERC Order No. 672. To date in 2007, there has been significant progress towards finalizing and implementing the protocols and reporting forms that are needed for NERC to report and interchange violation and mitigation plan information with FERC pursuant to the CMEP. Additional protocols, procedures, and reporting forms that may be required by NERC and FERC in the future will be mutually determined and developed on an as, and when, needed basis.

### **3.6 Violation Reporting & Interfacing with Canadian Authorities**

NERC will report and interface with jurisdictional authorities in Canada regarding violations of mandatory reliability standards. NERC will establish appropriate relationships, protocols, and procedures with these relevant authorities and other entities.

## **4. Reporting and Data Management**

The manager of reporting and data management will lead the NERC effort to develop internal procedures for collecting, analyzing, reporting, and tracking of all alleged and confirmed violations.

### **4.1 Data Collection and Tracking**

The NERC Web-based Compliance Data Management System (CDMS) portal system is currently undergoing acceptance testing and should be implemented in October 2007 to replace the current EXCEL/ACCESS reporting system. The regions will use this Web-based portal to directly access and update all information for pre-June 18 violations from their respective regions.

A new expanded EXCEL Workbook was created and implemented by NERC to collect the expanded violation and tracking data for all post-June 18 compliance violations. This Workbook includes provisions to collect all information to track the process that a violation follows per the CMEP uniform program document. It is granular and set up in a modular manner based upon process category. (Re: Core information for *Initial Notice of Alleged Violation, Notice of Alleged Violation and Penalty/Sanction, Mitigation, Contested/Hearings/Appeals, Settlements, Remedial Action Directives, Proposed Sanction and Penalty, Disposition and Final Record, etc.*).

NERC is preparing a functional specification for an expanded Web-based portal system to meet the needs of NERC for all future violations, registration, and enforcement information. The process used by the regions to populate the Workbook for post-June 18 violations will be incorporated into the expanded Web-based portal system to allow for a seamless transition. The Workbook serves as a “proof-of-concept” tool that will be modified and finalized based on the requirements set by FERC. A software vendor will be awarded a contract to identify the technical specifications and develop the system. The system should be completed and available during the first quarter of 2008. In developing this expanded Web-based portal system, NERC will initiate a users group of the regional entities to consider a proposal to create a single NERC-wide system.

### **4.2 Reporting**

Through the expanded EXCEL Workbook, regional entities provide a violation report to NERC within five days of the regional entity learning of such violation, and within 48 hours for violations of specific “high risk” standards. Each regional entity will analyze each occurrence of a violation to assess the actual or potential impact it may have on the reliability of the bulk power system. NERC will then provide FERC and the applicable governmental authorities with such information in an agreed upon format and in a timely manner.

NERC will also provide quarterly reports to FERC, and the applicable governmental regulators, summarizing information surrounding the violations that have occurred; this would include the status of the mitigation plans to bring the entity into compliance. In addition, public quarterly reports will be developed that provide the status of confirmed violations. Further, NERC will identify reliability trends in monthly reports developed for the NERC Board of Trustees Compliance Committee. The current reporting system will continue to be used if the expanded Web-based portal system is delayed or unavailable for any reason.

NERC is committed to develop improved safeguards to maintain the confidentiality of alleged reliability standard violations, and both alleged and confirmed violations of critical infrastructure standards.

### **4.3 Document Management and Record Retention**

NERC developed a document management procedure for 2007 and continues to evaluate document management and record retention software for 2008 implementation.

## **5. Strategic Planning and 2008, 2009 Initiatives**

NERC holds regular meetings with regional entity compliance managers to facilitate consistency and uniformity and promote best practices, as well as to identify improvement areas and lessons learned. NERC will hold a strategic planning meeting annually where regional entity compliance managers and NERC staff will work to develop annual goals and objectives for the NERC CMEP.

## Compliance Monitoring and Enforcement Program

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Initiatives planned for implementation in 2008 and 2009 include:

- Implement key compliance indicators and performance measures for NERC and regional entity performance tracking. This initiative will enable NERC and the regional entities to identify best practices and target areas for improvement.
- Implement automated solutions for manual processes. Perform review of activities and eliminate unnecessary steps.
- Develop Web-based tools to provide guidance for penalty calculations and documentation.
- Enhance knowledge management tools that allow NERC and the regional entities to capture ideas and experiential knowledge to benefit the compliance program.
- Select and implement new document management software.