

**NERC**

NORTH AMERICAN ELECTRIC  
RELIABILITY CORPORATION

# ERO Enterprise Enforcement Cause Code User Guide

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**RELIABILITY | RESILIENCE | SECURITY**



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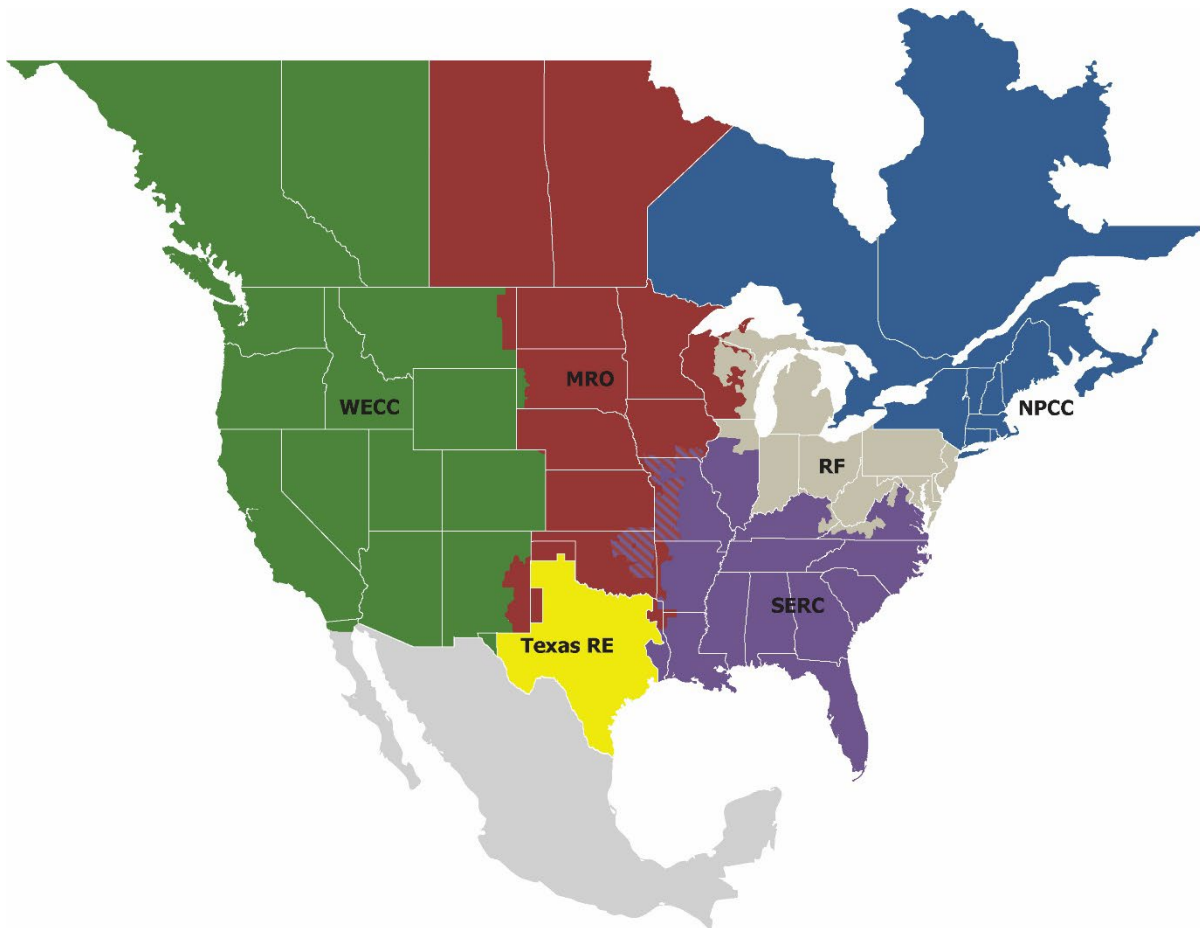
## Preface

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Electricity is a key component of the fabric of modern society and the Electric Reliability Organization (ERO) Enterprise serves to strengthen that fabric. The vision for the ERO Enterprise, which is comprised of NERC and the six Regional Entities, is a highly reliable, resilient, and secure North American bulk power system (BPS). Our mission is to assure the effective and efficient reduction of risks to the reliability and security of the grid.

Reliability | Resilience | Security  
*Because nearly 400 million citizens in North America are counting on us*

The North American BPS is made up of six Regional Entities as shown on the map and in the corresponding table below. The multicolored area denotes overlap as some load-serving entities participate in one Regional Entity while associated Transmission Owners/Operators participate in another.



<b>MRO</b>	Midwest Reliability Organization
<b>NPCC</b>	Northeast Power Coordinating Council
<b>RF</b>	ReliabilityFirst
<b>SERC</b>	SERC Reliability Corporation
<b>Texas RE</b>	Texas Reliability Entity
<b>WECC</b>	WECC

## Statement of Purpose

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The purpose of this user guide is to help registered entities and Regional Entities determine the appropriate enforcement-specific cause code that corresponds to the identified root cause of the noncompliance.

To mitigate and minimize recurrence of a noncompliance, the correct root cause and contributing causes, if any, of a noncompliance need to be identified. The cause should be consistent with the facts and the actual risk of the issue to implement effective mitigations.

The final enforcement cause codes were integrated into Align for Regional Entities in Q4 2023 and are expected to be integrated in Align for registered entities in Q2 2025 to be used for all disposition methods, replacing the current event analysis codes.

The purpose of the enforcement cause codes is to characterize the most used causes in the enforcement space in a structured manner to provide more consistency across the Regional Entities. The enforcement cause codes will also be used to facilitate the identification and analysis of trends associated with noncompliance to strengthen the ERO Enterprise's understanding of noncompliance and related risks to the bulk power system (BPS). For example, enforcement cause codes will allow similar issues to be grouped for analysis to determine whether the issue is a common problem and identify the frequency of the problem, whether the issue is widespread, and the effectiveness of prior mitigation solutions.

ERO Enterprise enforcement staff will review the list and analyze the use of the cause codes periodically to determine whether additional changes are necessary.

# Chapter 1: Enforcement Cause Codes

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## Root Cause Analysis

Root-cause analysis (RCA) is the process of discovering the underlying factors or fundamental reasons for the occurrence of issues and is an important step in identifying appropriate solutions to a problem. RCA focuses on remedying the root causes rather than just the symptoms. There can be, and often are, multiple causes; however, the focus should be on *how* and *why* something happened, not *who* was responsible. It is important to be methodical and find concrete cause-effect evidence for proper identification of root causes to implement proper corrective and preventive actions.

## Five Whys Method

The “Five Whys” is a problem-solving method that helps an investigator identify the root cause of a problem, understand how one process can cause a chain of problems, and determine the relationships between different root causes. It involves drilling down into any problem by asking “why” or “what caused this problem.” In some cases, more or fewer “whys” may be required depending on the depth of the root cause. This technique can help an investigator quickly determine the root cause of a problem. See [Figure 1.1](#).



**Figure 1.1: The Five Whys**

Once the RCA is complete and a root cause has been identified, enforcement staff should be able to select one of the enforcement cause codes in Align that best defines the root cause identified. For additional causes, enforcement staff should use the contributing cause to multi-select additional causes.

## Cause Codes in Align

### Registered Entity View

In Align, the enforcement cause codes can be found on the *Finding form*. The registered entity can click on the “*Create Self-Report*” or “*Create Self-Log*” and create a new finding, then navigate down to the *Extent of Condition and Root Cause* section to find the cause codes. In this section the entity can select a “*Root Cause Code*” and “*Contributing Cause Code(s)*.”

The “*Root Cause Code*” is a single select field that can be selected by either typing “ENF” in the search or by clicking on the search button using the magnifying glass icon and then selecting the radio button for the appropriate cause code. “*Contributing Cause Code(s)*” is a multi-select field and can be selected by either typing “ENF” in the search or by clicking on the search button using the magnifying glass icon and then selecting the check boxes for the appropriate cause codes. See [Figure 1.2](#) below for screenshots from Align.

### Regional Entity View

In Align, the enforcement cause codes can be found in two modules used by the Regional Entities. In the *PNC Processing* module, navigate to the *PNC Review* tab and then the *Root Cause Analysis* section. In the *Enforcement Processing* module, navigate to the *Open Enforcement Actions* tab and then the *Violation Extent of Condition, Root Cause, and Risk Analysis* section.

In both forms, “*Root Cause Code*” is a single select field that can be selected by clicking on the search button using the magnifying glass icon and then selecting the radio button for the appropriate cause code.

“*Contributing Cause Code(s)*” is a multi-select field and can be selected by clicking on the search button using the magnifying glass icon and then selecting the check boxes for the appropriate cause codes. See [Figure 1.2](#) below for screenshots from Align.

## Chapter 1: Enforcement Cause Codes

**Extent of Condition and Root Cause**

Has an Extent of Condition Review been performed?  No

Root Cause Code

Contributing Cause Code(s)

What cause(s) led to the Potential Noncompliance?

Note: Please use the Enforcement Cause Codes from the list in the magnifying glass by selecting 'ENF' first. Do not use the old cause codes that begin with A.

Root Cause Code

Contributing Cause Code(s)

Root Cause Analysis Notes

Root Cause Analysis Complete

CAUSE CODES	
NAME	
<input checked="" type="radio"/> ENF-01 - Change Management	
<input type="radio"/> ENF-02 - Communication/Coordination - Internal	
<input type="radio"/> ENF-03 - Communication/Coordination - External	
<input type="radio"/> ENF-04 - Design - Ineffective Process Flow or System Design	
<input type="radio"/> ENF-05 - Activity Performed but Lack of or Deficient or Incorrect Documentation	
<input type="radio"/> ENF-06 - Activity Performed but Lack of or Deficient or Incorrect Documentation from Third-Party	
<input type="radio"/> ENF-07 - Lack of or Deficient Policy/Procedure/Process – Company Wide	
<input type="radio"/> ENF-08 - Lack of or Deficient Policy/Procedure/Process - Department/Business Level	
<input type="radio"/> ENF-09 - Ineffective Preventive Controls	
<input type="radio"/> ENF-10 - Ineffective Validation/Detective Controls	
<input type="radio"/> ENF-11 - Additional Training Needed	
<input type="radio"/> ENF-12 - Ineffective Training Program	
<input type="radio"/> ENF-13 - Lack of Understanding	
<input type="radio"/> ENF-14 - Ineffective Management Oversight	

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Confirm Close

Contributing Cause Codes	
NAME	
<input type="checkbox"/> ENF-01 - Change Management	
<input type="checkbox"/> ENF-02 - Communication/Coordination - Internal	
<input type="checkbox"/> ENF-03 - Communication/Coordination - External	
<input type="checkbox"/> ENF-04 - Design - Ineffective Process Flow or System Design	
<input checked="" type="checkbox"/> ENF-05 - Activity Performed but Lack of or Deficient or Incorrect Documentation	
<input type="checkbox"/> ENF-06 - Activity Performed but Lack of or Deficient or Incorrect Documentation from Third-Party	
<input type="checkbox"/> ENF-07 - Lack of or Deficient Policy/Procedure/Process – Company Wide	
<input type="checkbox"/> ENF-08 - Lack of or Deficient Policy/Procedure/Process - Department/Business Level	
<input type="checkbox"/> ENF-09 - Ineffective Preventive Controls	
<input type="checkbox"/> ENF-10 - Ineffective Validation/Detective Controls	
<input type="checkbox"/> ENF-11 - Additional Training Needed	
<input type="checkbox"/> ENF-12 - Ineffective Training Program	
<input type="checkbox"/> ENF-13 - Lack of Understanding	
<input type="checkbox"/> ENF-14 - Ineffective Management Oversight	

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Confirm Close

Note: Please use the Enforcement Cause Codes from the list in the magnifying glass by selecting 'ENF' first. Do not use the old cause codes that begin with A.

Root Cause Code

Contributing Cause Code(s)

ENF-05 - Activity Performed but Lack of or Deficient or Incorrect Documentation

**Figure 1.2: Screenshots for ENF Cause Codes from Align**

## Chapter 2: Enforcement Cause Codes

**Table 2.1** Lists the final enforcement cause codes by code name and description of the code and provides examples of root causes and their appropriate enforcement cause codes. These are meant to serve as a guide and do not represent the entire range of possible root causes of noncompliance.

Subject matter experts should keep in mind the enforcement cause codes as they review and evaluate the root cause of the noncompliance. The concurrent consideration should help with proper identification of the root cause and contributing cause of the noncompliance.

<b>Table 2.1: Enforcement Cause Codes</b>	
<b>Code</b>	<b>Name and Description</b>
1	<b>Change Management</b> - Made changes without understanding the downstream impact of the change on other components of the system and its related processes.
2	<b>Communication/Coordination – Internal</b> - Ineffective coordination or communication between personnel/departments within the same company. Lack of or poor coordination/communication within the same business unit and/or across business units sharing compliance obligations (organizational silos), which resulted in confusion regarding expectations and ownership of tasks.
3	<b>Communication/Coordination – External</b> - Ineffective coordination/communication between responsible parties, vendors, external entities. Lack of or poor coordination/communication with external individuals the entity relies upon for compliance obligations, which resulted in confusion by either internal or external individuals regarding expectations and ownership of tasks.
4	<b>Design – Ineffective Process Flow or System Design or failure of system/technology</b> - Items were missing from design, design-related documentation, or system or technology failure.
5	<b>Lack of/deficient documented evidence</b> - The required activities in the process or procedure were completed but evidence was either not, or partially, documented.
6	<b>Lack of/deficient documented evidence - Third Party/Vendor</b> - Lack of documented evidence by a third-party (e.g., vendor or through a sale or organizational transition). The required activities in the process or procedure were completed but evidence was either not, or partially, documented.
7	<b>Lack of/deficient policy/Procedure - Company Wide</b> - Ineffective management policy – high level, company-wide issue. Needs new policy/procedure/process (did not exist) or was deficient.
8	<b>Lack of/deficient policy/procedure - Department/Business Level</b> - Ineffective business-level procedure/process – Standard Operating Procedure, Instructions, department-based. Needs new policy/procedure/process (did not exist) or was deficient.
9	<b>Ineffective Preventive Controls</b> - Lack of or ineffective internal controls designed to prevent noncompliance. Detective controls were implemented but there was an ineffective or lack of preventative control (e.g., checklist, secondary reviewer, workflow, or a backup or a redundant control).
10	<b>Ineffective Validation/Detective Controls</b> - Lack of or an ineffective validation/detective control. Preventative controls were implemented but there was an ineffective or lack of a validation/detective control after completion of the task.
11	<b>Additional Training Needed</b> - Training program is adequate but additional training needed. The overall training program was adequate but training on a required task was not part of the employee’s training requirements or frequency of the training was insufficient to maintain the required knowledge and skill to perform the job (e.g., did not consider the complexity of certain tasks or individual’s skillset or



**Table 2.1: Enforcement Cause Codes**

Code	Name and Description
	experience). If the training design/content is adequate, but the entity failed to effectively deliver it to their employees or track the required training.
12	<b>Lack of/deficient training materials and content</b> - The quality of the training objective, or training content and/or material was incomplete or unclear such that it did not contain all the information necessary for staff to fully perform all the task requirements in the procedure.
13	<b>Lack of understanding or lack of compliance awareness</b> - The entity is aware of the obligations of the Reliability Standard but lacks the understanding of how to fully implement the obligations. Or the entity failed to implement certain obligations of the Standard because it was unaware of them; there was an erroneous interpretation of what is required in the Standard, especially a new standard in effect, including the implementation date and which devices and/or activities are covered coordination with another entity.
14	<b>Ineffective Organizational Methods</b> - An event or condition that can be directly traced to organizational actions or methods. An organizational problem may be attributed to methods such as directions, monitoring, assessment, accountability, oversight, corrective actions, and supervisory methods.
15	<p><b>Ineffective Resource or Project Planning</b> - There was improper allocation of resources and/or improper scoping of project, including (i) insufficient supervisory resources to provide necessary supervision; (ii) insufficient workforce or and equipment/tools to support identified compliance-related goals/objectives/tasks, including allotting sufficient time to complete tasks, train, or to implement quality procedures or controls; (iii) work planning did not account for potential interruptions and/or special circumstances; and/or (iv) work planning did not include coordination with all departments or business units involved in completing the tasks.</p> <p>This cause often occurs when upgrading equipment or systems, transitioning to NERC Reliability Standards for the first time (e.g., merger/acquisition or transitioning to a new version of the standard).</p>
16	<p><b>Exceptional Circumstances</b> - Noncompliance occurred from unpreventable factors beyond the control of the entity.</p> <p>Factors beyond the control of the entity including weather, natural disaster, fire (lightning/sabotage), or other phenomena, such as power loss attributed to outside supplied power and infectious disease outbreak or pandemic.</p>
17	<b>Human Performance Failure</b> - Sufficient controls, procedures, and training implemented but not followed due to human error.
18	<b>Other</b> - Other should only be used if there were no other Cause Code in the list that would apply to the noncompliance.

<b>Version History</b>		
<b>Version</b>	<b>Date</b>	<b>Description of Changes</b>
1.0	December 12, 2024	Newly created Cause Coding User Guide