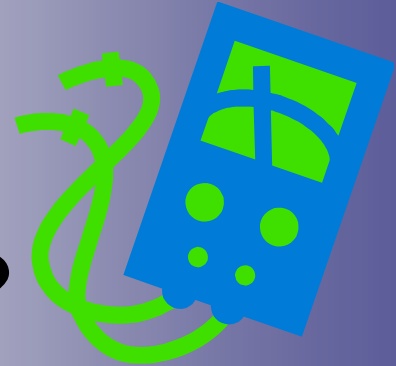


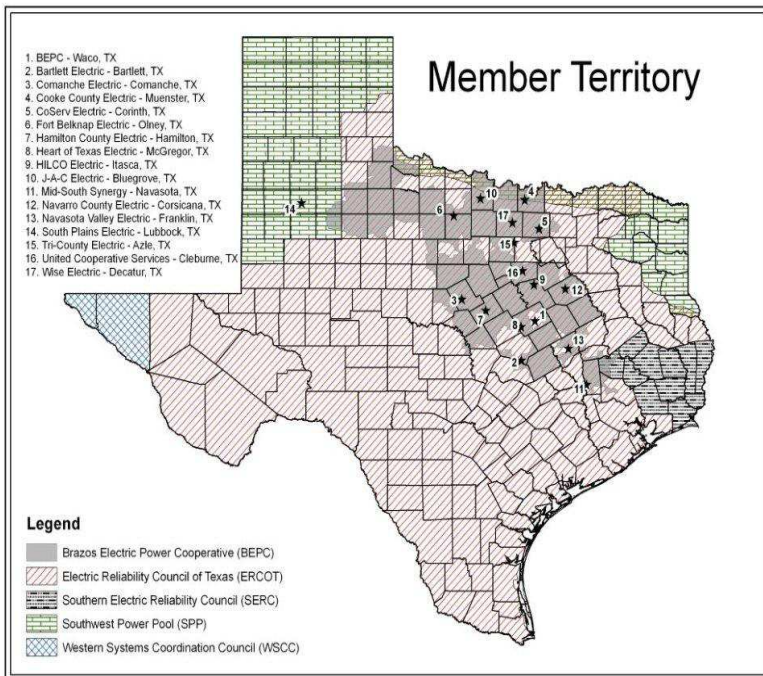
# Are You Positive?



## An Evolving Outlook on Compliance Learning

Shari Heino  
Compliance Manager  
Brazos Electric Power  
Cooperative, Inc.

# About Brazos



- ◆ Approximately 350 employees
- ◆ Three wholly-owned operating generating facilities
- ◆ Over 2600 miles of transmission facilities serving member coops in 68 Texas counties
- ◆ TOP, TO, DP, LSE, TP, GO, GOP
- ◆ Subject to all CIP (version 3) standards
- ◆ Mostly in ERCOT Region (small number of facilities in SERC Region)
- ◆ Robust formal compliance program with formal training, senior management and board oversight, and progressive discipline policy
- ◆ No Brazos employee is only responsible for NERC compliance, but compliance is a significant portion of many employees' jobs.

# My Background

- ◆ Licensed Attorney (Texas) - since 1998
- ◆ Attorney for ERCOT - 1999 to 2007
- ◆ Mathews & Freeland (utility law firm) - 2007 to 2011
- ◆ Compliance Manager, Brazos - 2011 to present
- ◆ Dog Trainer - 1980 to present



*Disclaimer:  
Opinions  
expressed  
are my own.*

# Times are Changing - Mixed Messages

- OLD: We learn best through punishment or fines.
- OLD: If something goes wrong, it is always an individual's fault.
- NEW: We should recognize and reward desired behavior.
- NEW: If something goes wrong, we probably need to fix the system, not the individual.



# Compliance Learning - Running in Circles?

- ◆ **The bad news:**  
We will never be done.
- ◆ **The good news:** We will never be done.  
***There will always be opportunity to improve.***



# What I Have Learned About Learning From My Dogs

- ◆ Motivation is critical to learning.
- ◆ Every interaction or event is a vehicle for learning. That learning may be useful or damaging depending on the behaviors or reactions of those involved.
- ◆ Learning is a two way street. The trainee influences the trainer and vice versa.

# Why Positive Reinforcement?

- ◆ A philosophy of punishment will only incent the bare minimum in performance.
- ◆ It takes positive reinforcement to obtain superior results.
- ◆ Note: Discipline policy is still necessary.



# But Does it Work on People?

- ◆ Absolutely!
- ◆ Simply pick the right motivators for your subject:

<b>My Dog</b>	<b>Me</b>
Praise	Praise / Applause
Dog Treats	Money / Gifts / Chocolate
Belly Rubs	Fun



# Positive Reinforcement is More Than Rewards

- ◆ Does the name Pavlov ring a bell?
- ◆ Anticipation of a reward is highly motivating.
- ◆ Your team members need goals so they can track their progress toward success.
- ◆ Training through games and competition can promote active engagement and learning.
- ◆ Does your team typically look forward to positive results or fear making a mistake?

# Motivation in Figuring It Out – Example: Cyber Security Training Game Show



## Categories

Access Control	Proper Use of CCAs	Information Protection	Policies and Procedures	Action Plans
<u>\$100</u>	<u>\$100</u>	<u>\$100</u>	<u>\$100</u>	<u>\$100</u>
<u>\$200</u>	<u>\$200</u>	<u>\$200</u>	<u>\$200</u>	<u>\$200</u>
<u>\$300</u>	<u>\$300</u>	<u>\$300</u>	<u>\$300</u>	<u>\$300</u>
<u>\$400</u>	<u>\$400</u>	<u>\$400</u>	<u>\$400</u>	<u>\$400</u>
<u>\$500</u>	<u>\$500</u>	<u>\$500</u>	<u>\$500</u>	<u>\$500</u>

# Another Example – Implementing Electronic Document Retention

- ◆ Moving to new headquarters this summer
- ◆ Paper purge days scheduled with contests (including online treasure hunts in document mgmt. system)
- ◆ 30,000 pounds of paper recycled to date
- ◆ Prizes were small but employees enjoyed the experience



# Reliability Compliance is No Laughing Matter, But...

You can improve motivation to learn about compliance by having fun or being funny:

- ◆ Have a competition
- ◆ Play a game
- ◆ Make reports more entertaining
- ◆ Have employees role play or act out scenarios in training sessions

# Being Positive

## The Little Things That Matter

- ◆ Most opportunities for positive reinforcement involve mundane everyday activities. If you wait for something special, you have missed a hundred small opportunities to reinforce a desired result.
- ◆ Say thank you every chance you get – be specific about the action you are acknowledging.
- ◆ A card or candy is an inexpensive way to recognize someone.
- ◆ Small spot bonuses or gift cards might seem insignificant, but they can make a lasting impact.
- ◆ Encourage feedback – acknowledged input is a positive experience for the contributor and you might learn something.



BEPC RELIABILITY PROCESS MANUAL

Thank You Process Form

Version Number 01.00

Original Effective Date: December 2012

Version Date: Dec. 2012

**Sometimes,  
a simple  
thank you  
will do...**



**You're  
Number  
1.01!**



*Thank you for your  
input in our 2012 NERC  
process review!*

# Failure as a Opportunity to Learn

- ◆ Failure can give us a chance to engage our minds to figure out new solutions.
- ◆ Finding these solutions can make a failure a very positive experience.
- ◆ *Caution:* If we set employees up to fail as part of a learning experience, we must be careful to make it a positive experience.

# Learning From Failure to Avoid a Phishing Email

Employees,

The Brazos Electric will be making changes to the current employee benefits package immediately.

You have the opportunity to maintain the same benefits, or change, by using to the employee portal to do so.

You can enter the portal [here](#).

Failure to respond to the selection, will result in the new default package being assigned to you.

Please take the time to address this as it is very important to your future.

Thank you.

Brazos Electric Cooperative, Inc  
Human Resources Department





# With compliance learning, the risks of emails like this are minimized:

**Fed Ex**

---

Order: JN-8947-32438007

Order Date: **Thursday, 3 January 2013, 11:23 AM**

Dear Customer,

Your parcel has arrived at the post office at January 6. Our courier was unable to deliver the parcel to you.

To receive your parcel, please, go to the nearest office and show this receipt.

**GET & PRINT RECEIPT**

Best Regards, The FedEx Team.



---

FedEx 1995-2012

COOPERATIVE

# Learning from a Failure in Situational Awareness

## Brazos Self Report - February 2011 Winter Event

- ◆ About 5 am, February 2, 2011, during a system emergency, ERCOT issued the following verbal directive: “Do not take units off-line while ERCOT is in emergency operations [...].”
- ◆ About 8 am the same day, while the system emergency was still in effect (although restoration of off-line load had begun), a Brazos operator instructed removal of a 15 MW hydroelectric resource from service in order to conserve water (equipment limitation).
- ◆ Realizing the mistake *2 minutes later*, the Brazos operator requested the hydro facility operator return the off-line unit to service, but the unit was then subject to a 30-minute operational limitation delay before restart could occur.
- ◆ During the course of the above events, ERCOT ISO was not contacted. Therefore, Brazos self-reported a potential violation of IRO-001 R8 (comply with Reliability Coordinator directives unless such actions would violate safety, equipment, or regulatory or statutory requirements and immediately inform the Reliability Coordinator of the inability to perform the directive).

# Traditional Mitigation Efforts

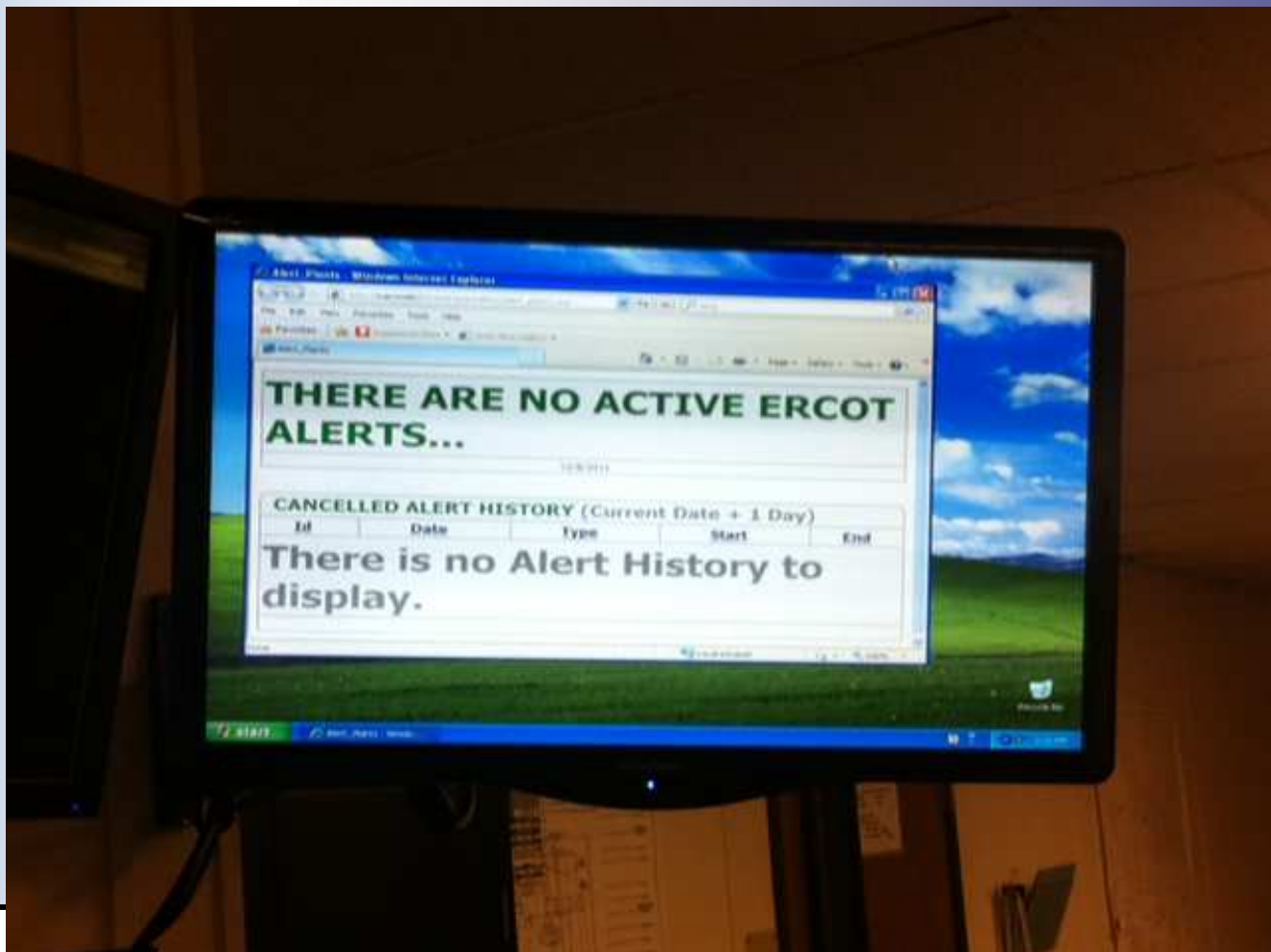
- ◆ Re-training staff
- ◆ Disciplinary action (written reprimand)
- ◆ Submitted as mitigation plan with self-report

*These are the type of mitigation efforts that have been expected in the past. But this problem was not simply an issue with a single individual.*

# New mitigation idea – fix the system, not the individual

- ◆ Proposed during settlement discussions
- ◆ Goal: increased operator awareness of on-going ERCOT instructions via dedicated monitors
- ◆ Installed monitors displaying ERCOT emergency instructions very visible and close to phones at QSE and plant control rooms - allows double-checking by plant and control room staff regarding ERCOT instructions

# Monitor for each control room (plant and control room) – Normal Conditions



# Monitor for each location – Alert Active

Issued on: 9/12/2012- 12:08

## ALERT

- Physical Responsive Capability falls below 3000 MW.

**Instruction to plant**  
(ERCOT is issuing an Advisory due to Physical Responsive Capability falling below 3000 MW. Please ensure you are telemetering correct values.)

**This is a TEST only. Please Disregard.**

9/12/2012

### CANCELLED ALERT HISTORY (Current Date + 1 Day)

<u>Id</u>	<u>Date</u>	<u>Type</u>	<u>Start</u>	<u>End</u>
<b>There is no Alert History to display.</b>				

# Take Away Concepts

- ◆ Achieving superior results requires a high level of motivation. If you want to get great results, you must acknowledge specific successes, even small ones, in a positive manner. *Your team should look forward to the results of their efforts.*
- ◆ All interactions and events are opportunities for learning, but our responses will influence what learning happens.
- ◆ Learning often needs to happen at the company or system level (fix the system, not the individual).

# Recommended Reading

- ◆ *Don't Shoot the Dog* by Karen Pryor
- ◆ *What Shamu Taught Me About Life, Love, and Marriage* by Amy Sutherland
- ◆ *Animals Make Us Human* by Temple Grandin



# The End?

*Not really – we are never finished learning.*



## QUESTIONS?