

Reliability Standard Audit Worksheet¹

EOP-011-1 – Emergency Operations

This section to be completed by the Compliance Enforcement Authority.

Audit ID: Audit ID if available; or REG-NCRnnnnn-YYYYMMDD
Registered Entity: Registered name of entity being audited
NCR Number: NCRnnnnn
Compliance Enforcement Authority: Region or NERC performing audit
Compliance Assessment Date(s)²: Month DD, YYYY, to Month DD, YYYY
Compliance Monitoring Method: [On-site Audit | Off-site Audit | Spot Check]
Names of Auditors: Supplied by CEA

Applicability of Requirements

	BA	DP	GO	GOP	IA	LSE	PA	PSE	RC	RP	RSG	TO	TOP	TP	TSP
R1													X		
R2	X														
R3									X						
R4									X						
R5									X						

Legend:

Text with blue background:	Fixed text – do not edit
Text entry area with Green background:	Entity-supplied information
Text entry area with white background:	Auditor-supplied information

¹ NERC developed this Reliability Standard Audit Worksheet (RSAW) language in order to facilitate NERC’s and the Regional Entities’ assessment of a registered entity’s compliance with this Reliability Standard. The NERC RSAW language is written to specific versions of each NERC Reliability Standard. Entities using this RSAW should choose the version of the RSAW applicable to the Reliability Standard being assessed. While the information included in this RSAW provides some of the methodology that NERC has elected to use to assess compliance with the requirements of the Reliability Standard, this document should not be treated as a substitute for the Reliability Standard or viewed as additional Reliability Standard requirements. In all cases, the Regional Entity should rely on the language contained in the Reliability Standard itself, and not on the language contained in this RSAW, to determine compliance with the Reliability Standard. NERC’s Reliability Standards can be found on NERC’s website. Additionally, NERC Reliability Standards are updated frequently, and this RSAW may not necessarily be updated with the same frequency. Therefore, it is imperative that entities treat this RSAW as a reference document only, and not as a substitute or replacement for the Reliability Standard. It is the responsibility of the registered entity to verify its compliance with the latest approved version of the Reliability Standards, by the applicable governmental authority, relevant to its registration status.

The NERC RSAW language contained within this document provides a non-exclusive list, for informational purposes only, of examples of the types of evidence a registered entity may produce or may be asked to produce to demonstrate compliance with the Reliability Standard. A registered entity’s adherence to the examples contained within this RSAW does not necessarily constitute compliance with the applicable Reliability Standard, and NERC and the Regional Entity using this RSAW reserves the right to request additional evidence from the registered entity that is not included in this RSAW. Additionally, this RSAW includes excerpts from FERC Orders and other regulatory references. The FERC Order cites are provided for ease of reference only, and this document does not necessarily include all applicable Order provisions. In the event of a discrepancy between FERC Orders, and the language included in this document, FERC Orders shall prevail.

² Compliance Assessment Date(s): The date(s) the actual compliance assessment (on-site audit, off-site spot check, etc.) occurs.

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Findings

(This section to be completed by the Compliance Enforcement Authority)

Req.	Finding	Summary and Documentation	Functions Monitored
R1			
R2			
R3			
R4			
R5			

Req.	Areas of Concern

Req.	Recommendations

Req.	Positive Observations

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Subject Matter Experts

Identify the Subject Matter Expert(s) responsible for this Reliability Standard.

Registered Entity Response (Required; Insert additional rows if needed):

SME Name	Title	Organization	Requirement(s)

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R1 Supporting Evidence and Documentation

- R1.** Each Transmission Operator shall develop, maintain and implement a Reliability Coordinator-approved Emergency Operating Plan to mitigate operating Emergencies on its Transmission System. At a minimum, the Emergency Operating Plan shall include the following elements:
 - 1.1.** Roles and responsibilities to activate the Emergency Operating Plan;
 - 1.2.** Strategies to prepare for and mitigate Emergencies including, at a minimum:
 - 1.2.1.** Notification to the Reliability Coordinator, to include current and projected System conditions, when experiencing an operating Emergency;
 - 1.2.2.** Voltage control;
 - 1.2.3.** Cancellation or recall of Transmission and generation outages;
 - 1.2.4.** System reconfiguration;
 - 1.2.5.** Redispatch of generation request;
 - 1.2.6.** Operator-controlled manual Load shedding plan coordinated to minimize the use of automatic Load shedding;
 - 1.2.7.** Mitigation of reliability impacts of extreme weather conditions; and
 - 1.3.** Strategies for coordinating Emergency Operating Plans with impacted Transmission Operators and impacted Balancing Authorities.
- M1.** Each Transmission Operator will have a dated and approved Emergency Operating Plan developed in accordance with Requirement R1 that has been approved by its Reliability Coordinator, as shown with the documented approval from its Reliability Coordinator; and will have as evidence, such as operator logs or other operating documentation, voice recordings or other communication documentation to show that its plan was implemented in accordance with Requirement R1.

Registered Entity Response (Required):

Question: Has there ever been an Emergency where this Emergency Operating Plan has been implemented?

Yes No

If yes, provide a list of such Emergencies.

[Note: A separate spreadsheet or other document may be used. If so, provide the document reference below.]

Registered Entity Response (Required):

Compliance Narrative:

Provide a brief explanation, in your own words, of how you comply with this Requirement. References to supplied evidence, including links to the appropriate page, are recommended.

Evidence Requested:ⁱ

Provide the following evidence, or other evidence to demonstrate compliance.
(R1) Provide documented plan.

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(R1) Evidence of activation, such as operator logs, voice recordings, or other communications, for times when an Emergency has occurred.

Registered Entity Evidence (Required):

The following information is requested for each document submitted as evidence. Also, evidence submitted should be highlighted and bookmarked, as appropriate, to identify the exact location where evidence of compliance may be found.

File Name	Document Title	Revision or Version	Document Date	Relevant Page(s) or Section(s)	Description of Applicability of Document

Audit Team Evidence Reviewed (This section to be completed by the Compliance Enforcement Authority):

Compliance Assessment Approach Specific to EOP-011-1, R1

This section to be completed by the Compliance Enforcement Authority

	(R1) Confirm plan is dated and approved by the Reliability Coordinator.
	(R1) Confirm plan was developed in accordance with Requirement R1 Parts 1.1 through 1.3.
	(R1) Verify implementation of plan. (see note below)

Note to Auditor:

Requirement R1 includes activation of the Emergency Operating Plan. Part 1.2 Subparts of Requirement R1 include an extensive list of elements; therefore, if one or more of the elements are not applicable to the entity, it is acceptable to list the element(s) as Not Applicable in the entity's Emergency Operating Plan. Elements listed as Not Applicable should have corresponding verifiable rationale.

Auditors can gain reasonable assurance the plan was implemented by determining if specific actions prescribed by the plan have taken place. For example, if the plan calls for certain procedures to occur, then auditors could ask for evidence demonstrating the procedure has been implemented. As auditors should obtain reasonable, not absolute, assurance the plan was implemented, testing implementation on a sample basis may be appropriate.

Auditor Notes:

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R2 Supporting Evidence and Documentation

- R2.** Each Balancing Authority shall develop, maintain, and implement a Reliability Coordinator-approved Emergency Operating Plan to mitigate Capacity and Energy Emergencies. At a minimum, the Emergency Operating Plan shall include the following elements:
 - 2.1.** Roles and responsibilities to activate the Emergency Operating Plan;
 - 2.2.** Notification to the Reliability Coordinator, to include current and projected System conditions, when experiencing a Capacity Emergency or Energy Emergency;
 - 2.3.** Criteria to declare an Energy Emergency Alert, per Attachment 1;
 - 2.4.** Strategies to prepare for and mitigate Emergencies including, at a minimum:
 - 2.4.1.** Generating resources in its Balancing Authority Area:
 - 2.4.1.1.** capability and availability;
 - 2.4.1.2.** fuel supply and inventory concerns;
 - 2.4.1.3.** fuel switching capabilities; and
 - 2.4.1.4.** environmental constraints.
 - 2.4.2.** Voluntary Load reductions;
 - 2.4.3.** Public appeals;
 - 2.4.4.** Requests to government agencies to implement their programs to achieve necessary energy reductions;
 - 2.4.5.** Reduction of internal utility energy use;
 - 2.4.6.** Customer fuel switching;
 - 2.4.7.** Use of Interruptible Load, curtailable Load and demand response;
 - 2.4.8.** Operator-controlled manual Load shedding plan coordinated to minimize the use of automatic Load shedding; and
 - 2.4.9.** Mitigation of reliability impacts of extreme weather conditions.
 - 2.5.** Strategies for coordinating Emergency Operating Plans with impacted Balancing Authorities and impacted Transmission Operators
- M2.** Each Balancing Authority will have a dated and approved Emergency Operating Plan developed in accordance with Requirement R2 that has been approved by its Reliability Coordinator, as shown with the documented approval from its Reliability Coordinator; and will have as evidence, such as operator logs or other operating documentation, voice recordings or, other communication documentation to show that its plan was implemented in accordance with Requirement R2.

Registered Entity Response (Required):

Question: Has there ever been an Emergency where this Emergency Operating Plan has been implemented?

Yes No

If yes, provide a list of such Emergencies.

[Note: A separate spreadsheet or other document may be used. If so, provide the document reference below.]

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Registered Entity Response (Required):

Compliance Narrative:

Provide a brief explanation, in your own words, of how you comply with this Requirement. References to supplied evidence, including links to the appropriate page, are recommended.

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Evidence Requested:ⁱ

Provide the following evidence, or other evidence to demonstrate compliance.
(R2) Provide documented plan.
(R2) Evidence of activation, such as operator logs, voice recordings, or other communications, for times when an Emergency has occurred.

Registered Entity Evidence (Required):

The following information is requested for each document submitted as evidence. Also, evidence submitted should be highlighted and bookmarked, as appropriate, to identify the exact location where evidence of compliance may be found.

File Name	Document Title	Revision or Version	Document Date	Relevant Page(s) or Section(s)	Description of Applicability of Document

Audit Team Evidence Reviewed (This section to be completed by the Compliance Enforcement Authority):

Compliance Assessment Approach Specific to EOP-011-1, R2

This section to be completed by the Compliance Enforcement Authority

	(R2) Confirm plan is dated and approved by the Reliability Coordinator.
	(R2) Confirm plan was developed in accordance with Requirement R2 Parts 2.1 through 2.5.
	(R2) Verify implementation of plan. (see note below)

Note to Auditor:

Requirement R2 includes activation of the Emergency Operating Plan. Part 2.4 Subparts of Requirement R1 include an extensive list of elements; therefore, if one or more of the elements are not applicable to the entity, it is acceptable to list the element(s) as Not Applicable in the entity's Emergency Operating Plan. Elements listed as Not Applicable should have corresponding verifiable rationale.

Auditors can gain reasonable assurance the plan was implemented by determining if specific actions prescribed by the plan have taken place. For example, if the plan calls for certain procedures to occur,

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then auditors could ask for evidence demonstrating the procedure has been implemented. As auditors should obtain reasonable, not absolute, assurance the plan was implemented, testing implementation on a sample basis may be appropriate.

Auditor Notes:

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R3 Supporting Evidence and Documentation

- R3.** Each Reliability Coordinator shall approve or disapprove, with stated reasons for disapproval, Emergency Operating Plans submitted by Transmission Operators and Balancing Authorities within 30 calendar days of submittal.
- M3.** The Reliability Coordinator will have documentation, such as e-mails with receipts or registered mail receipts, that it approved or disapproved, with stated reasons for disapproval, the Transmission Operator and Balancing Authority submitted and revised Emergency Operating Plans within 30 calendar days of submittal in accordance with Requirement R3.

Registered Entity Response (Required):

Compliance Narrative:

Provide a brief explanation, in your own words, of how you comply with this Requirement. References to supplied evidence, including links to the appropriate page, are recommended.

Evidence Requested:ⁱ

Provide the following evidence, or other evidence to demonstrate compliance.

(R3) For Transmission Operators and Balancing Authorities, provide dated evidence of plan approval or disapproval. Evidence should include date of submission.

Registered Entity Evidence (Required):

The following information is requested for each document submitted as evidence. Also, evidence submitted should be highlighted and bookmarked, as appropriate, to identify the exact location where evidence of compliance may be found.

File Name	Document Title	Revision or Version	Document Date	Relevant Page(s) or Section(s)	Description of Applicability of Document

Audit Team Evidence Reviewed (This section to be completed by the Compliance Enforcement Authority):

Compliance Assessment Approach Specific to EOP-011-1, R3

This section to be completed by the Compliance Enforcement Authority

	(R3) Through the review of submitted documentation and interviews, confirm that the entity approves or disapproves plans within 30 calendar days.
	(R3) For disapproved plans, confirm the entity has stated reasons for disapproval.

Note to Auditor:

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Auditor Notes:

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R4 Supporting Evidence and Documentation

- R4.** Each Reliability Coordinator that receives an Emergency notification from a Transmission Operator or Balancing Authority shall notify, as soon as practical, other impacted Reliability Coordinators, Balancing Authorities and Transmission Operators.

- M4.** Each Reliability Coordinator that receives an Emergency notification from a Balancing Authority or Transmission Operator will have, and provide upon request, evidence that could include, but is not limited to, operator logs, voice recordings or transcripts of voice recordings, electronic communications or equivalent evidence that will be used to determine if it communicated the Balancing Authority’s or Transmission Operator’s Emergency to impacted Reliability Coordinators, Balancing Authorities, and Transmission Operators in accordance with Requirement R4.

Registered Entity Response (Required):

Question: Has a Transmission Operator or Balancing Authority Emergency notification been received during the audit period?

Yes No

If yes, provide a list of notifications. If no, then Requirement R4 is not applicable.

[Note: A separate spreadsheet or other document may be used. If so, provide the document reference below.]

Registered Entity Response (Required):

Compliance Narrative:

Provide a brief explanation, in your own words, of how you comply with this Requirement. References to supplied evidence, including links to the appropriate page, are recommended.

Evidence Requested:¹

Provide the following evidence, or other evidence to demonstrate compliance.

(R4) Provide time-stamped evidence of entity’s notification received from Balancing Authority or Transmission Operator of an Emergency, and time-stamped operator logs, voice recordings or transcripts of voice recordings, electronic communications or equivalent evidence that demonstrate communication to other impacted Reliability Coordinators, Balancing Authorities, and Transmission Operators of an Emergency notification.

Registered Entity Evidence (Required):

The following information is requested for each document submitted as evidence. Also, evidence submitted should be highlighted and bookmarked, as appropriate, to identify the exact location where evidence of compliance may be found.

File Name	Document Title	Revision or Version	Document Date	Relevant Page(s) or Section(s)	Description of Applicability of Document

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Audit Team Evidence Reviewed (This section to be completed by the Compliance Enforcement Authority):

Compliance Assessment Approach Specific to EOP-011-1, R4

This section to be completed by the Compliance Enforcement Authority

(R4) Through the review of submitted documentation and interviews, confirm that other impacted Reliability Coordinators, Balancing Authorities, and Transmission Operators were informed of Emergencies as soon as practical.

Note to Auditor:

Auditor Notes:

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R5 Supporting Evidence and Documentation

- R5.** Each Reliability Coordinator that has a Balancing Authority experiencing a potential or actual Energy Emergency within its Reliability Coordinator Area shall initiate an Energy Emergency Alert, as detailed in Attachment 1.
- M5.** Each Reliability Coordinator, that has had a Balancing Authority experiencing a potential or actual Energy Emergency within its Reliability Coordinator Area, will have, and provide upon request, evidence that could include, but is not limited to, operator logs, voice recordings or transcripts of voice recordings, electronic communications or equivalent evidence that it initiated an Energy Emergency Alert, as detailed in Attachment 1 in accordance with Requirement R5.

Registered Entity Response (Required):

Question: Has a Balancing Authority experienced a potential or actual Energy Emergency in entity's Area during the audit period? Yes No

If yes, provide a list of such actual or potential Emergencies and proceed to Evidence Requested section below. If no, the Requirement R5 is not applicable.

[Note: A separate spreadsheet or other document may be used. If so, provide the document reference below.]

Registered Entity Response (Required):

Compliance Narrative:

Provide a brief explanation, in your own words, of how you comply with this Requirement. References to supplied evidence, including links to the appropriate page, are recommended.

Evidence Requested:¹

Provide the following evidence, or other evidence to demonstrate compliance.
 (R5) Provide a list of all potential or actual Energy Emergencies in entity's footprint and operator logs, voice recordings or transcripts of voice recordings, electronic communications or equivalent evidence that demonstrate initiation of an Energy Emergency Alert.

Registered Entity Evidence (Required):

The following information is requested for each document submitted as evidence. Also, evidence submitted should be highlighted and bookmarked, as appropriate, to identify the exact location where evidence of compliance may be found.

File Name	Document Title	Revision or Version	Document Date	Relevant Page(s) or Section(s)	Description of Applicability of Document

Audit Team Evidence Reviewed (This section to be completed by the Compliance Enforcement Authority):

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Compliance Assessment Approach Specific to EOP-011-1, R5

This section to be completed by the Compliance Enforcement Authority

	(R5) Through the review of submitted documentation and interviews, confirm that the entity properly initiates an Energy Emergency Alerts as detailed in Attachment 1.
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Note to Auditor:

Auditor Notes:

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Additional Information:

Reliability Standard

The RSAW developer should provide the following information without hyperlinks. Update the information below as appropriate.

The full text of EOP-011-1 may be found on the NERC Web Site (www.nerc.com) under “Program Areas & Departments”, “Reliability Standards.”

In addition to the Reliability Standard, there is an applicable Implementation Plan available on the NERC Web Site.

In addition to the Reliability Standard, there is background information available on the NERC Web Site.

Capitalized terms in the Reliability Standard refer to terms in the NERC Glossary, which may be found on the NERC Web Site.

Sampling Methodology [If developer deems reference applicable]

Sampling is essential for auditing compliance with NERC Reliability Standards since it is not always possible or practical to test 100% of either the equipment, documentation, or both, associated with the full suite of enforceable standards. The Sampling Methodology Guidelines and Criteria (see NERC website), or sample guidelines, provided by the Electric Reliability Organization help to establish a minimum sample set for monitoring and enforcement uses in audits of NERC Reliability Standards.

Regulatory Language [Developer to ensure RSAW has been provided to NERC Legal for links to appropriate Regulatory Language – See example below]

E.g. FERC Order No. 742 paragraph 34: “Based on NERC’s.....”

E.g. FERC Order No. 742 Paragraph 55, Commission Determination: “We affirm NERC’s.....”

Selected Glossary Terms [If developer deems applicable]

The following Glossary terms are provided for convenience only. Please refer to the NERC web site for the current enforceable terms.

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Revision History for RSAW

Version	Date	Reviewers	Revision Description
1	7/17/2014	NERC Compliance, Standards, RSAWTF	New Document

ⁱ Items in the Evidence Requested section are suggested evidence that may, but will not necessarily, demonstrate compliance. These items are not mandatory and other forms and types of evidence may be submitted at the entity's discretion.

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