

# DRAFT Reliability Standard Audit Worksheet<sup>1</sup>

## MOD-031-1 – Demand and Energy Data

*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)<sup>2</sup>:** Month DD, YYYY, to Month DD, YYYY  
**Compliance Monitoring Method:** Audit  
**Names of Auditors:** Supplied by CEA

### Applicability of Requirements *[RSAW developer to insert correct applicability]*

	BA	DP	GO	GOP	IA	LSE	PA	PSE	RC	RP	RSG	TO	TOP	TP	TSP
<b>R1</b>	X						X <sup>3</sup>								
<b>R2</b>	X <sup>4</sup>	X <sup>4</sup>				X <sup>4</sup>								X <sup>4</sup>	
<b>R3</b>	X <sup>5</sup>						X <sup>3,5</sup>								
<b>R4</b>	X					X	X <sup>3</sup>			X				X	

<sup>1</sup> 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.

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

<sup>3</sup> This proposed standard combines “Planning Authority” with “Planning Coordinator” in the list of applicable functional entities. The NERC Functional Model lists “Planning Coordinator” while the registration criteria lists “Planning Authority,” and they are not yet synchronized. Until that occurs, the proposed standard applies to both Planning Authority and Planning Coordinator.

<sup>4</sup> As identified by a Planning Coordinator or Balancing Authority in a data request issued per Requirement R1 Part 1.1 of MOD-031-1.

<sup>5</sup> As requested by applicable Regional Entity.

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**Subject Matter Experts**

Identify Subject Matter Expert(s) responsible for this Reliability Standard. (Insert additional rows if necessary)

**Registered Entity Response (Required):**

SME Name	Title	Organization	Requirement(s)

DRAFT

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**R1 Supporting Evidence and Documentation**

- R1.** Each Planning Coordinator or Balancing Authority may develop and issue a data request, as necessary, for the collection of Total Internal Demand, Net Energy for Load and Demand Side Management data from applicable entities in their area.<sup>6</sup> The data request shall include:
- 1.1.** A list of Transmission Planners, Balancing Authorities, Load Serving Entities, and Distribution Providers that are required to provide the data (“Applicable Entities”).
  - 1.2.** A timetable for providing the data. (A minimum of 30-days must be allowed for responding to the request).
  - 1.3.** A request to provide any or all of the following actual data, as necessary:
    - 1.3.1.** Integrated hourly Total Internal Demands in megawatts for the prior year.
    - 1.3.2.** Monthly and annual peak hour actual Total Internal Demands in megawatts for the prior year.
    - 1.3.3.** Monthly and annual Net Energy for Load in gigawatthours for the prior year.
    - 1.3.4.** Annual peak hour weather normalized actual Total Internal Demand in megawatts for the prior year.
    - 1.3.5.** Monthly and annual peak hour deployed and realized Interruptible Load and Direct Control Load Management under the control or supervision of the System Operator in megawatts for the prior year.
  - 1.4.** A request to provide any or all of the following forecast data, as necessary:
    - 1.4.1.** Monthly peak hour forecast Total Internal Demands in megawatts for the next two calendar years.
    - 1.4.2.** Monthly forecast Net Energy for Load in gigawatthours for the next two calendar years.
    - 1.4.3.** Peak hour forecast Total Internal Demands (summer and winter) in megawatts for ten calendar years into the future.
    - 1.4.4.** Annual forecast Net Energy for Load in gigawatthours for ten calendar years into the future.
    - 1.4.5.** Forecasts of Interruptible Load and Direct Control Load Management under the control or supervision of the System Operator for up to ten calendar years into the future, as requested, for summer and winter peak system conditions.
  - 1.5.** A request to provide a summary explanation of the following, if necessary:
    - 1.5.1.** The assumptions and methods used in the development of aggregated peak Demand and Net Energy for Load forecasts.

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<sup>6</sup> For the Balancing Authority, “their area” encompasses their Balancing Authority Area as defined in the NERC Glossary of Terms. For the Planning Coordinator, “their area” encompasses the facilities for which the Planning Coordinator coordinates and integrates transmission facilities, service plans, resource plans, and protection systems.

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- 1.5.2. The Demand and energy effects of Interruptible and Direct Control Load Management under the control or supervision of the System Operator.
- 1.5.3. How Demand Side Management is addressed in the forecasts of its Peak Demand and annual Net Energy for Load.
- 1.5.4. How the peak load forecast compares to actual load for the prior calendar year with due regard to controllable load,<sup>7</sup> temperature and humidity variations and, if applicable, how the assumptions and methods for future forecasts were adjusted.

**M1.** The Planning Coordinator or Balancing Authority shall have a dated data request, either in hardcopy or electronic format, in accordance with Requirement R1.

**Registered Entity Response to General Compliance with this Requirement (Required):**

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

**Evidence Requested<sup>8</sup>:**

Provide the following evidence, or other evidence to demonstrate compliance. If the provisioning of this evidence is burdensome or otherwise unreasonable, contact your CEA to arrange for sampling or other means of reduction of the quantity of evidence submitted.

Copies of entity's data requests developed and issued in accordance with Requirement R1, or a statement that no data requests were issued.

**Registered Entity Evidence (Required):**

The following information is recommended for all evidence submitted:  
File Name, Document Title, Revision, Date, Page(s), Section(s), Section Title(s), Description  
Also, evidence submitted should be highlighted and bookmarked, as appropriate, to identify the exact location where evidence of compliance may be found.

<sup>7</sup> For the purpose of this standard, the term "controllable load" means both Interruptible Load and Direct Control Load Management as referenced in FERC Order 693 Paragraph 1267.

<sup>8</sup> 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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**Audit Team Evidence Reviewed (This section to be completed by the Compliance Enforcement Authority):**


**Compliance Assessment Approach Specific to MOD-033-1, R1**

***This section to be completed by the Compliance Enforcement Authority***

	The RSAW Developer will complete this section with a set of detailed steps for the audit process. See the RSAW Developer’s Guide for more information.
	For data requests selected by auditor for audit testing, review and verify the request included items described in parts 1.1 and 1.2.

**Note to Auditor:** Items listed in parts 1.3 through 1.5.4 are optional and are included in the data request at the entity’s discretion. A data request may include requests for additional data, but there is no requirement to provide the additional data under this standard.

Entity assertions that no data requests were issued (see “a statement that no data requests were issued” in the Evidence Requested section above) do not have to be in writing.

**Auditor Notes:**

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**R2 Supporting Evidence and Documentation**

- R2.** Each Applicable Entity shall provide the data requested by its Planning Coordinator or Balancing Authority in accordance with the data request issued pursuant to Requirement R1.
  
- M2.** Each Applicable Entity shall have evidence such as dated e-mails or dated transmittal letters that it provided the data requested in accordance with Requirement R2.

**Registered Entity Response to General Compliance with this Requirement (Required):**

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

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**Evidence Requested<sup>9</sup>:**

Provide the following evidence, or other evidence to demonstrate compliance. If the provisioning of this evidence is burdensome or otherwise unreasonable, contact your CEA to arrange for sampling or other means of reduction of the quantity of evidence submitted.

See M2.

**Registered Entity Evidence (Required):**

The following information is recommended for all evidence submitted:

File Name, Document Title, Revision, Date, Page(s), Section(s), Section Title(s), Description

Also, evidence submitted should be highlighted and bookmarked, as appropriate, to identify the exact location where evidence of compliance may be found.

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

**Compliance Assessment Approach Specific to MOD-033-1, R2**

*This section to be completed by the Compliance Enforcement Authority*

The RSAW Developer will complete this section with a set of detailed steps for the audit process. See the RSAW Developer's Guide for more information.

Review evidence (documented date of request and reply) to determine if entity responses to Planning Coordinator or Balancing Authority's data request(s) were made in accordance with Requirement R1 and within timetable established in part 1.2.

**Note to Auditor:** Based on the language in the requirement and the purpose of the standard, which is to facilitate the sharing of data to support reliability studies, the auditor should not only verify that the data was delivered within the timeframe(s) specified, but also verify that the data delivered met the requirements of the request. However, this standard does not specify criteria around quality of the data, so auditors should not make any assessments in that regard. The responding entity does not have to provide data beyond that requested per parts 1.3 through 1.5.4 of Requirement R1.

<sup>9</sup> 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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Auditors at their discretion may communicate with Planning Coordinators or Balancing Authorities to determine if data requests made of entity under audit were delivered within the timeframe(s) specified and met the requirements of the request.

**Auditor Notes:**

**R3 Supporting Evidence and Documentation**

- R3.** The Planning Coordinator or the Balancing Authority shall provide the data collected under Requirement R2 to the applicable Regional Entity upon request. In no event, however, shall the Planning Coordinator or the Balancing Authority be required to provide the data in less than 75 days from the date it received the data request from the Regional Entity.
  
- M3.** Each entity identified by the Regional Entity in its data request, shall have evidence such as dated e-mails or dated transmittal letters that it provided the data requested in accordance with Requirement R3.

**Registered Entity Response to General Compliance with this Requirement (Required):**

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

**Evidence Requested<sup>10</sup>:**

Provide the following evidence, or other evidence to demonstrate compliance. If the provisioning of this evidence is burdensome or otherwise unreasonable, contact your CEA to arrange for sampling or other means of reduction of the quantity of evidence submitted.

See M3.

**Registered Entity Evidence (Required):**

The following information is recommended for all evidence submitted:

File Name, Document Title, Revision, Date, Page(s), Section(s), Section Title(s), Description

Also, evidence submitted should be highlighted and bookmarked, as appropriate, to identify the exact location

<sup>10</sup> 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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where evidence of compliance may be found.

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


**Compliance Assessment Approach Specific to MOD-033-1, R3**

***This section to be completed by the Compliance Enforcement Authority***

	The RSAW Developer will complete this section with a set of detailed steps for the audit process. See the RSAW Developer’s Guide for more information.
	Review evidence (documented date of the Regional Entity’s request and entity’s reply) to determine if they provided responses to Regional Entity’s data request(s) in accordance with Requirement R3 and within 75 days from the receipt date of the data request.

**Note to Auditor:** Auditor should communicate with entity’s Regional Entity to determine whether the Regional Entity had made a data request to the entity under audit. In the instance where the Planning Coordinator or the Balancing Authority collected additional data from Applicable Entities, the additional information may be provided to the Regional Entity but there is no obligation to do so under this requirement.

**Auditor Notes:**

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**R4 Supporting Evidence and Documentation**

**R4.** Each Load Serving Entity, Planning Coordinator, Balancing Authority, Transmission Planner or Resource Planner shall, within 45 days of a written request for the data included in parts 1.3-1.5 of Requirement R1 from any other Load Serving Entity, Planning Coordinator, Balancing Authority, Transmission Planner or Resource Planner with a demonstrated reliability need for such data, provide or otherwise make available that data to the requesting entity. This requirement does not modify an entity’s obligation pursuant to Requirement R2 to respond to data requests issued by its Planning Coordinator or Balancing Authority pursuant to Requirement R1. Unless otherwise agreed upon, the Applicable Entity is not required to:

- provide any data not within the scope of part 1.3-1.5 of Requirement R1;
- alter the format in which it maintains or uses the data; or



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- provide data that conflicts with the Applicable Entity’s confidentiality, regulatory, or security requirements.
- 4.1.** If the Applicable Entity does not provide data requested under this requirement because (1) the requesting entity did not demonstrate a reliability need for the data; or (2) providing the data would conflict with the Applicable Entity’s confidentiality, regulatory, or security requirements, the Applicable Entity shall provide a written response to the requesting entity specifying the data that is not being provided and on what basis.

**M4.** Each Load Serving Entity, Planning Coordinator, Balancing Authority, Transmission Planner or Resource Planner identified in Requirement R4, shall have evidence such as dated e-mails or dated transmittal letters that it provided the data requested or provided a written response specifying the data that is not being provided and the basis for not providing the data in accordance with Requirement R4.

**Registered Entity Response to General Compliance with this Requirement (Required):**

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

**Evidence Requested<sup>11</sup>:**

Provide the following evidence, or other evidence to demonstrate compliance. If the provisioning of this evidence is burdensome or otherwise unreasonable, contact your CEA to arrange for sampling or other means of reduction of the quantity of evidence submitted.

Evidence listed in M4 as well as a copy of the data request; or a statement that a data request was not received.

**Registered Entity Evidence (Required):**

The following information is recommended for all evidence submitted:  
File Name, Document Title, Revision, Date, Page(s), Section(s), Section Title(s), Description  
Also, evidence submitted should be highlighted and bookmarked, as appropriate, to identify the exact location where evidence of compliance may be found.

<sup>11</sup> 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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**Audit Team Evidence Reviewed (This section to be completed by the Compliance Enforcement Authority):**


**Compliance Assessment Approach Specific to MOD-033-1, R4**

*This section to be completed by the Compliance Enforcement Authority*

	The RSAW Developer will complete this section with a set of detailed steps for the audit process. See the RSAW Developer’s Guide for more information.
	Review evidence (documented date of request and reply) to determine if entity responses to data request(s) were made in accordance with Requirement R4 and within 45 days of the date of the written request.

**Note to Auditor:** Based on the language in the requirement and the purpose of the standard, which is to facilitate the sharing of data to support reliability studies, the auditor should not only verify that the data was delivered within the timeframe(s) specified, but also verify that the data delivered met the requirements of the request. However, this standard does not specify criteria around quality of the data, so auditors should not make any assessments in that regard. The responding entity does not have to provide data beyond that requested per parts 1.3 through 1.5.4 of Requirement R1.

Auditors, at their discretion, may communicate with the requesting Load Serving Entities, Planning Coordinators, Balancing Authorities, Transmission Planners, Resource Planners to determine if responses to data requests were appropriate in accordance with this Requirement.

Entity assertions that no data requests were issued (see “a statement that no data requests were issued” in the Evidence Requested section above) do not have to be in writing.

**Auditor Notes:**

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**Revision History**

Version	Date	Reviewers	Revision Description
1	11/05/2013	NERC compliance, Standards	New Document