

NERC

NORTH AMERICAN ELECTRIC
RELIABILITY CORPORATION

DRAFT TPL-007-4

CAP Extension

Request

Review Process

RELIABILITY | RESILIENCE | SECURITY



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Introduction

Background

This Electric Reliability Organization (ERO) Enterprise¹ TPL-007-4 Corrective Action Plan (CAP) Extension Review Process document addresses how ERO Enterprise Compliance Monitoring and Enforcement staff (CMEP staff) will jointly review requests for extensions to Corrective Action Plans (CAPs) developed under TPL-007-4 to ensure a timely, structured and consistent approach to CAP extension request submittals and processing.

NERC Compliance Assurance will maintain this document under existing ERO Enterprise processes. This document will be reviewed and updated by NERC Compliance Assurance, as needed.

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¹ The ERO Enterprise is comprised of NERC and the Regional Entities.

Process Overview

If a registered entity (entity) has determined that a Corrective Action Plan (CAP) developed in accordance with TPL-007-4 R7 or R11 cannot be met in the timetable provided per Part 7.3 or 11.3 due to situations beyond the control of the responsible entity, then the entity will submit a extension request to the ERO Enterprise for approval prior to the original required CAP completion date.

The steps outlined here should be followed to ensure a timely, structured and consistent approach to extension request submittals and processing.

Step 1 – Registered Entity Submittal

If a registered entity (entity) determines that it cannot meet the required timetable for completing a CAP, the entity will contact their Compliance Enforcement Authority (CEA) to coordinate submittal of an extension request. The entity should submit the request to their CEA using the template provided in [Appendix A: Entity Submittal Template](#) or through an alternate method designated by the CEA that includes the same information.

Entities are encouraged to submit the extension request as soon as they are aware they will not meet the CAP completion date to allow the ERO Enterprise time to approve the extension request before the original required completion date.

All CAP extension requests must be approved by the ERO Enterprise prior to original required CAP completion date.

Step 2 – ERO Enterprise Review

The CEA will ensure that all information detailed in TPL-007-4 Part 7.4 or 11.4 and requested in the Entity Submittal Template is provided in the entity's extension request submittal. The CEA will work with the entity to provide any missing information.

The CEA will notify NERC of the extension request submittal. The CEA and NERC will then perform a joint review of (1) the situation(s) beyond the control of the entity preventing implementation of the CAP within the identified timetable; and (2) the revisions to the CAP and updated timetable for implementing the selected actions. Any additional information requested by the ERO Enterprise to support the extension request review will be coordinated by the CEA.

The Standard language states that an entity will submit an extension request for a full or partial delay in the implementation of the CAP within the timetable provided in TPL-007-4 Part 7.3 or 11.3. The CEA and NERC will determine whether to approve the extension request based on the specific facts and circumstances provided as to how the situations causing the delay in completing the CAP are beyond the control of the entity.

Step 3 – Registered Entity Notification

The CEA will communicate the ERO Enterprise approval or denial of the extension request to the entity along with the rationale for the determination.

Appendix A: Entity Submittal Template

[Will be formatted into a form for submission that includes the following information]

Entity name:

NCR#:

Primary entity contact name and information:

Coordinated Oversight Group # (if applicable):

Regional Entities impacted (for MRREs only):

Start date of CAP:

Original completion date of CAP:

Description of system deficiencies identified and selected actions to achieve required System performance per TPL-007-4 Part 7.1:

Circumstances causing the delay for fully or partially implementing the selected actions:

Description of revisions to the selected actions, if applicable:

New proposed completion date of CAP: