

SERC Compliance Monitoring and Enforcement Program

Implementation Procedure 1.1 Procedure Development, Issuance and Control



SERC CMEP Implementation Procedure 1.1: Procedure Development, Issuance, and Control

Revision History

Revision	Date	Originator	Comments
0	May 31, 2007	T. Galloway	Document Origination.
1	December 15, 2007	J. Harrell	Major revisions to procedure and addition of Appendices
2	March 10, 2008	J. Harrell	Added provisions for stakeholder notification and commenting on procedures

Responsible SERC Group(s)

SERC Board Compliance Committee (BCC)
SERC Compliance Staff

Review and Re-Approval Requirements

This document will be reviewed every two years or as appropriate for possible revision. The existing or revised document will be re-approved by the SERC Board Compliance Committee (BCC), distributed by the Compliance Director to all applicable SERC staff, and posted on the website for member reference.

List of Appendices

Appendix A: Compliance Procedure Elements
Appendix B: Procedure Formatting
Appendix C: Procedure Writing Guidelines
Appendix D: SERC Abbreviations, Definitions and Terms
Appendix E: Procedure Acknowledgement

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1.0 Purpose

This procedure defines the overall approach used by SERC staff to develop and perform the detailed implementation procedures used to satisfy the requirements of the SERC Compliance Monitoring and Enforcement Program (CMEP).

2.0 Responsibilities

- The SERC Board Compliance Committee (BCC) is the approval authority for all compliance procedures unless otherwise designated, see Section 4.3 – Approval Authority and Section 4.4 – Temporary Procedure Changes / Approval Authority.
- Director of Compliance is responsible for:
 - Directing review and revision to implementation procedures based on changes to NERC Rules of Procedure (ROP), CMEP, SERC processes and stakeholder comments,
 - Designating SERC staff as Subject Matter Experts (SME) and backup SMEs for development and revision of specific implementation procedures,
 - Designating SERC staff to perform independent review of procedures and revisions to ensure that they conform to applicable SERC CMEP requirements,
 - Performing initial review and approval of procedures and revisions,
 - Submitting procedures and revisions to Board Compliance Committee for final approval,
 - Ensure posting of all draft and current procedures and revisions on the SERC website,
 - Ensuring notification to SERC stakeholders of the posting of drafts of new or revised procedures,
 - Ensuring SERC stakeholders have a method for commenting on all current implementation procedures,
 - Ensuring SMEs review stakeholder comments for incorporation into draft procedures,
 - Ensuring that stakeholder comments regarding entity due process, NERC Compliance Monitoring and Enforcement Plan and/or NERC Rules of Procedure are incorporated into current drafts or active procedures and revision, if applicable
 - Stakeholder comments regarding entity due process, NERC Compliance Monitoring and Enforcement Plan and/or NERC Rules of Procedure will be given the highest priority for incorporation into existing or draft procedures and revisions, if applicable, and
 - Stakeholder comments regarding procedure enhancements will be incorporated into existing or draft procedures and revisions as time allows, if applicable.
- SMEs and backup SMEs, are responsible for:
 - Development of implementation procedures as directed,
 - Review of stakeholder comments on implementation procedures and determination if revisions are warranted based on comments,
 - Maintaining a list of proposed changes to assigned procedures for incorporation

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- into the next revision,
- Revising procedures, as directed, to incorporate required changes identified by SERC staff resulting from changes to the ROP, SERC CMEP requirements and stakeholder comments,
- Forwarding draft procedures to Director of Compliance for approval,
- Forwarding Director of Compliance approved procedures to the Procedures Coordinator for final processing for submission to the BCC.
- Designated SERC staff is responsible for performing independent reviews of procedures to ensure they conform to applicable ROP and SERC CMEP requirements.
- Procedures Coordinator is responsible for:
 - Ensuring that an implementation procedures comment form is available on the SERC website to allow SERC stakeholders to comment on procedures,
 - Maintaining a listing of the most current procedures and revisions,
 - Maintaining a listing of assigned SME and SME backups for each procedure,
 - Maintaining a listing of SERC staff proposed revisions to each procedure,
 - Maintaining a listing of stakeholder proposed revisions to each procedure,
 - Maintaining a secure, protected from editing, electronic set of initial, revised and draft procedures on their personal computer and Compliance Server,
 - Providing SMEs with an editable electronic version of the most current procedures, when required for editing,
 - Reviewing and preparing all procedures to ensure consistent formatting and proper identification for submission to the BCC for final approval,
 - Forwarding draft procedures and revisions to Director of Compliance for approval prior to posting on SERC website for stakeholder comments,
 - Posting of draft procedures and revision on the SERC website for stakeholder review and comment for a nominal period of 2 weeks,
 - Forwarding completed procedures to Director of Compliance for submission to BCC,
 - Ensuring that the most recent revision to all implementation procedures are posted on the SERC website for reference and review,
 - Preparing BCC approved procedures for website posting, and secure electronic storage,
 - Providing notification of, and Procedure Acknowledgement forms to SERC staff upon issuance of new or revised Implementation Procedures,
 - Ensuring notification to SERC stakeholders of new and revised procedure posting,
 - Providing updated CDs with a full set of updated original and revised Implementation Procedures, to be maintained in each of the SERC Controlled Copy Implementation Procedure Manuals on procedure issuance or revision:
 - Director of Compliance,
 - Compliance Enforcement Manager,
 - Manager of Compliance Audits,
 - Procedures Coordinator.
- Compliance Executive Assistant will be responsible for maintaining up-to-date the

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Controlled Copies of Compliance Implementation Procedure manuals located in the following offices:

- Director of Compliance,
- Compliance Enforcement Manager,
- Manager of Compliance Audits, and
- Procedures Coordinator.

3.0 References

SERC CMEP Implementation Overview, Section 1.0.

4.0 Procedure Steps

4.1 Procedure Development

The Compliance Director, or his designee, will direct development of new procedures or revision to existing procedures, as needed, to ensure proper implementation of ROP and SERC CMEP requirements and to incorporate appropriate stakeholder suggestions.

NOTE: Revisions to existing procedures should be tracked (Track Changes, on Reviewing Toolbar) to allow easy comparison and comment to proposed changes.

The assigned Subject Matter Expert (SME), or backup SME as appropriate, shall:

- Review stakeholder comments on assigned procedures to determine if revision is warranted based on said comments,
- Prioritize procedure revisions,
 - Required revisions based on changes to the ROP, SERC CMEP and stakeholder comments that indicate SERC procedures are more stringent than ROP or CMEP requirements will be given the highest revision priority and completed as soon as possible,
 - Required revisions resulting from changes in SERC processes or stakeholder proposed enhancements will be completed as time allows.
- Review and incorporate the following items, at minimum, into the new or revised procedure, as appropriate:
 - SERC CMEP requirements or changes,
 - NERC ROP changes,
 - Updated NERC Forms,
 - SERC staff's recommended revisions to provide added detail, clarification, or to enhance performance (Procedure Edit List), and
 - Stakeholder originated revisions, as appropriate.
- Coordinate with Director of Compliance in assignment of procedure responsibilities and backup responsibilities, ensuring a system of check and balances,
- Contact the Procedures Coordinator to obtain editable copy of most recent

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- procedure revision and a Procedure Edit List, if applicable,
- Develop step-by-step procedures, with as much detail as required, to ensure the proper steps are completed to obtain the desired objective,
- Adhere to the requirements of Appendix B, Procedure Formatting, as much as possible, to ensure consistency in procedure appearance,
- Adhere to Appendix C, Procedure Writing Guidelines,
- Forward draft procedure to assigned independent reviewer for comment,
- Coordinate comments with other SERC staff, as required, and incorporate comments into procedure, as applicable,
- Forward draft procedure to Director of Compliance, or his designee, for review and approval,
- Forward approved procedure to Procedures Coordinator for final formatting, posting for comment and preparation for BCC review and approval; see Section 4.3 – Approval Authority and Section 4.4 – Temporary Procedure Changes / Approval Authority.

The assigned Independent Reviewer for a procedure shall review the procedure to ensure that:

- The following items, at minimum, have been incorporated into the new or revised procedure and that the procedure conforms to the requirements, as appropriate:
 - SERC CMEP requirements or changes,
 - NERC Rules of Procedure changes,
 - Updated NERC Forms.
- The steps and processes of the procedure flow in a logical and efficient manner, and will ensure completion of the desired task(s).

The Procedures Coordinator shall:

- Maintain a listing of stakeholder comments on implementation procedures,
- Forward stakeholder comments to the assigned SME for review and revision of procedure as appropriate,
- Update the submitting stakeholder as to the disposition and status of suggested changes,
- Review Director of Compliance approved procedures to ensure:
 - Adherence to Appendix A, Compliance Procedure Elements,
 - Adherence to Appendix B, Procedure Formatting,
 - Format procedure for presentation to the BCC for Approval,
 - Ensure use of proper procedure file naming conventions,
 - Incorporate BCC approval date into approved procedure,
 - Save a password to modify, electronic copy of the procedure to the Compliance Server and personal PC,
 - Convert approved procedure and all appendices to PDF format for posting on the SERC website,
 - Create and forward updated CDs of current procedures for storage in Compliance Implementation Procedures Manuals in the offices of:

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- Director of Compliance,
- Compliance Enforcement Manager,
- Manager of Compliance Audits, and
- Procedures Coordinator
- Coordinate posting of new or revised procedures and procedure drafts to website and notification to SERC stakeholders,
- Send an email notification of each BCC approved new or revised procedure to all Compliance staff members, to include a copy of the Procedure Acknowledgement Form (Appendix E),
- Compliance staff will, upon receipt of notice of procedure issuance or revision:
 - Read the procedure,
 - Complete the Procedure Acknowledgement Form, and
 - Forward Procedure Acknowledgement Form to the Compliance Executive Assistant for filing.
- Compliance Executive Assistant will:
 - Promptly update the following Compliance Implementation Procedures Manuals with new or revised procedures:
 - Director of Compliance,
 - Compliance Enforcement Manager,
 - Manager of Compliance Audits, and
 - Procedures Coordinator.
 - Verify receipt of Procedure Acknowledgement Forms from all Compliance Staff,
 - Store Procedure Acknowledgement Forms, for each individual procedure, in appropriate folders on the S drive.

4.2 Procedure Change Control

- All procedures will be assigned a unique identifying number.
- The basic structure of each compliance procedure will typically be as defined in Appendix A,
 - In some cases, due to formatting requirements, all or portions of a procedure will be allowed in different format and approved via SERC cover sheet.
- A Master Procedure Index will be maintained that lists all compliance implementation procedures currently in effect, including their current revision level.
- All new procedures will be assigned an initial revision level of 0.
- All procedure revisions will be numbered with the next sequential revision level.
- Procedure revisions will be designated by the Director of Compliance as either MAJOR or ADMINISTRATIVE
 - Major revisions are those that involve a change to procedure scope or intent. All revision 0 procedures are Major revisions by definition.
 - Administrative revisions are those that involve minor changes such as formatting and spelling corrections.

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- An independent review will be conducted to all new (Rev. 0) and Major procedure revisions to ensure conformance to applicable sections of the SERC CMEP.
- The current version of the procedure will be maintained on the SERC website
- A subject matter expert (SME) will be designated for each procedure to coordinate future revisions and to ensure the procedures are accurate and thorough.
- Suggested changes (enhancements) that do not impact the procedure relative to proper execution of CMEP requirements will be accrued by the SME / Procedure Coordinator and incorporated at the next scheduled revision.
- New and revised procedures will be distributed to all applicable SERC compliance staff via email upon approval,
- SERC Compliance staff will complete the associated Procedure Acknowledgement Form for each new or revised procedure, and forward the form to the Compliance Executive Assistant.

4.3 Approval Authority

- The BCC will review and approve all compliance procedures that have some bearing on registered entity “due process”.
- The BCC will approve all Revision 0 procedures
- If after approval of Rev. 0 the BCC concludes the procedure has no bearing on registered entity “due process” then the BCC can delegate approval authority for future revisions to the Director of Compliance.
- The Procedure Index will be updated to reflect required approval authority.

NOTE: Email ballot, using the same quorum and voting requirements as a BCC meeting, is an acceptable method for procedure approval.

4.4 Temporary Procedure Changes / Approval Authority

- Periodically, temporary procedure changes will be identified that are required to ensure proper execution of activities in accordance with CMEP requirements during an interim period between BCC meetings or telecons
- In those cases, when a full quorum of the BCC is not available for review, the Director of Compliance can initiate a temporary procedure change as follows:
 - Apply a cover sheet summarizing the revised sections of the procedure and/or
 - Make required changes within the procedure body, using track changes as appropriate to differentiate the change
- The temporary change will be designated with the current revision level and an alphabetical suffix (i.e., Rev. 1 A).
- The Director of Compliance will approve the change and obtain the concurrence of two of three of the BCC Chairman, BCC Vice Chair, and SERC President.

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- The temporary change will typically be presented for approval at the next scheduled BCC meeting or telecom.

4.5 SERC Definition of Terms

A listing of SERC abbreviations, definitions, and terms, beyond those contained in CMEP section 1.0, are contained in Appendix D.

Appendix A: Compliance Procedure Elements

1.0 Purpose

The purpose section of the procedure defines what sections of the compliance program the specific procedure is intended to implement. This section will also make direct reference to applicable sections of the SERC Compliance Monitoring and Enforcement Program (CMEP).

2.0 Responsibilities

Responsibilities of SERC staff, Advisory Groups, Committees, Registered entities, and other parties required to implement the procedure.

3.0 References

Direct reference to other applicable documents including SERC CMEP sections, NERC Rules of Procedure, and applicable SERC procedures upon which the content of the procedure is based.

4.0 Procedure Steps

Set of steps necessary to conduct required compliance activities including responsible groups and/or positions. Numbered steps are generally implemented in the sequence written. Bulleted steps can generally be performed in any order.

Hierarchy of steps is as follows:

4.X Text
 4.X.X Text
 4.X.X.X Text
 4.X.X.X.X Text

- Text
 - Text
 - Text

Cautions and Notes will typically be placed prior to the steps to which they pertain.

Appendix B: Compliance Procedure Formatting

Cover Page

Proper formatting of the document's cover page will help to ensure that formatting of succeeding pages is correct. The following "page setup" settings should be implemented when a blank template is opened, and confirmed when revising an existing procedure.

Page Setup (accessed through the File menu):

- On the Margins tab, set the left, right and top margins to 1" and the bottom margin to 0.5",
- Verify that page orientation is set to Portrait,
- On the Layout tab, under the Headers and Footers section, check the Different first page checkbox and set the distance From edge of page to 0.8" for the header and 0.5" for the footer.

Cover page Text:

- Cover page text will include two headings,
- The title of the document for which the procedure will satisfy a requirement,
- The title of the procedure proper,
- Both headings will use Arial, 22 pt., bold, SERC blue font(see Title, Header & Footer Color, below),
- Two blank lines will be inserted between titles,
- Cover page footer will be Arial, 10 pt, regular font,
- The SERC logo will be inserted in the middle of the blank space between the titles and bottom of the page and will be sized to 2.5"h by 3.5"w,
- Insert a page break to start the second page of the document, if required.

Cover page Header:

- The cover page header should be left blank

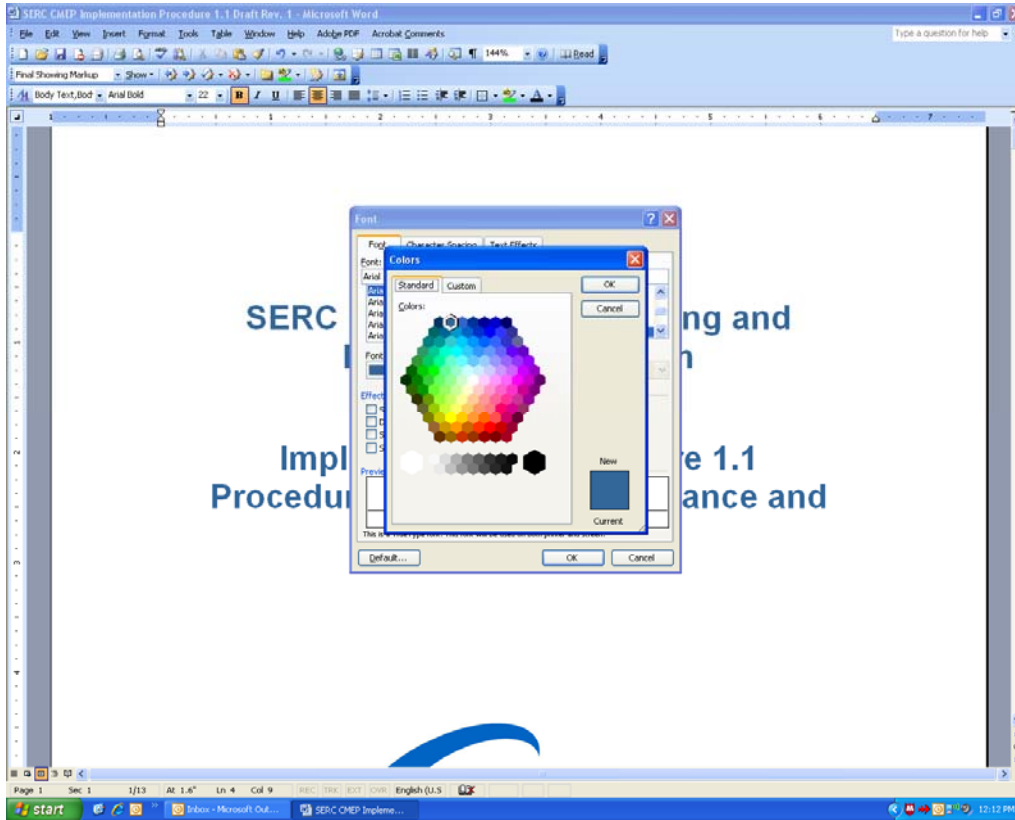
Cover page Footer:

- The cover page footer will consist of only the SERC Board Approved [DATE], left aligned, Revision [NUMBER], right aligned, and procedure effective date, right aligned.

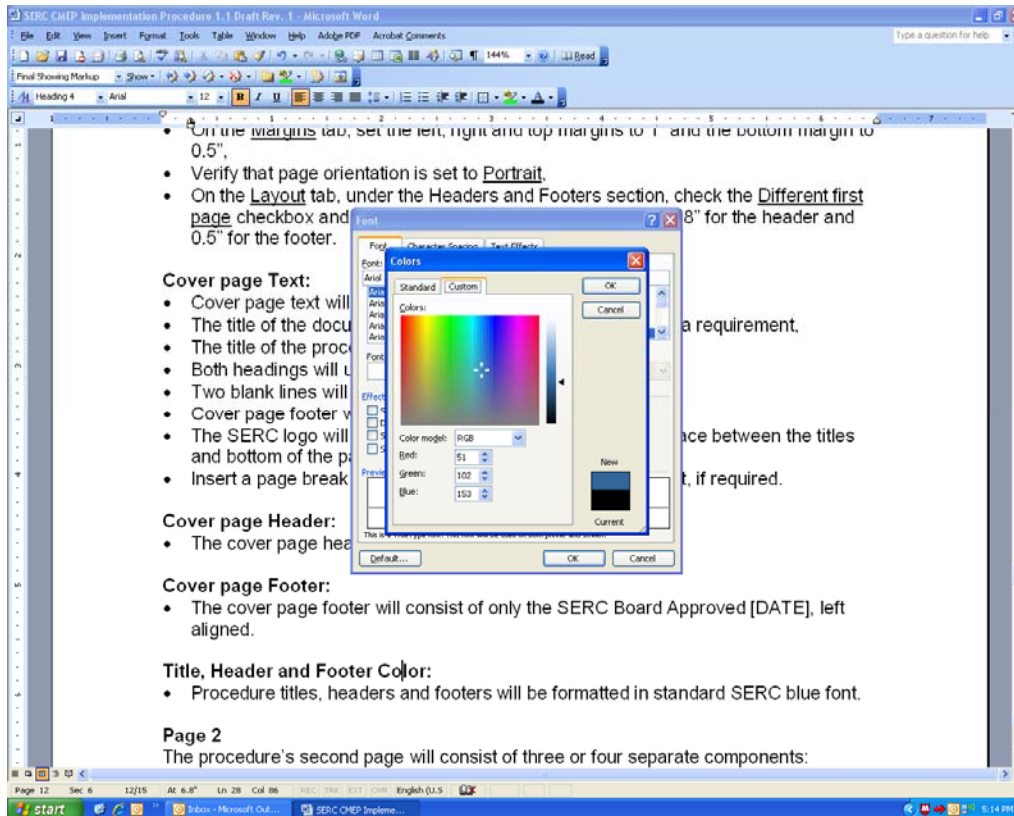
Title, Header and Footer Color:

- Procedure titles, headers and footers will be formatted in standard SERC blue font. The font color will be set by accessing the Format, Font menu item, selecting font color then, selecting More Colors. From the dialog box displayed, the font color may be set using the Standard or Custom tabs and making the following selection or entries:

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File Name

The procedure can be saved at any time, and should be saved frequently, during the development process. The file name shall consist of the procedure name, number, draft, if applicable, and revision number, i.e. Procedure 3.1 Compliance Audits Draft Rev 2 or Procedure 3.1 Compliance Audits Rev 2.

Page 2

The procedure's second page will consist of three or four separate components:

- **Revision History** – a table to document revision numbers, dates, originators and changes made to a procedure,
- **Responsible SERC Group(s)** – the designation of SERC Groups having responsibility for compliance with elements of the procedure,
- **Review and Approval Requirements** – a statement specifying frequency of procedure review and defining approval authority, and
- **List of Appendices** – If appendices to the procedure are independently subject to frequent or substantial changes, or the document is created using software that cannot be reasonably inserted into the document, a List of Appendices will be added. If all appendices to the document can be incorporated into the main document, appendices will be listed only in the Table of Contents.

The **Revision History** section will consist of an Arial, 12pt, bold type heading that is left-

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aligned; a single blank line between the headings and a four-column, four-row table, with the following formatting and text:

NOTE: Initial formatting of a Revision History table includes 4 rows within the table; the top row will contain column headings; the second row will contain document origination information; and, two rows will remain for subsequent revisions. Additional rows may be added as needed to accommodate subsequent revisions.

- The table will initially consist of four columns and four rows
 - Column widths will be set at 1", 1.3", 1.3" and 3.9", respectively,
 - The top row, headings, will be formatted with Arial, 12pt, bold font, centered within the column. All other rows will be left aligned, Arial 12 pt, regular font,
 - Column headings will be: Revision, Date, Originator and Comments, respectively.

The table and subsequent sections of the second page will be separated from each other with one blank line.

The Responsible SERC Group(s) section – will consist of an Arial, 12pt, bold type, left-aligned heading with a non-bold listing of those groups responsible for implementing the procedures, located directly below the heading (no blank lines).

Review and Approval and List of Appendices sections will have the same formatting as the Responsible SERC Group(s) section.

Header and Footer – The header and footer used throughout the rest of the procedure, including appendices if possible, will be set on page 2.

The header will identify the procedure as a SERC CMEP Implementation Procedure, followed by the procedure number and name, see header above. The header font will be Arial, Bold, 12 pt, using the SERC blue font described previously.

The footer will indicate the SERC BCC Approval date, left aligned; the procedure revision number, right aligned; and, page number of number of pages, right aligned. Draft procedures and revisions will be so indicated by replacing the SERC BCC Approval Date with the word "Draft" in the footer. The footer font will be Arial, 11 pt, and will also be SERC blue.

Page 3

Page 3 of the procedure will contain the Table of Contents. The Table of Contents should be created using specific font Styles within the body of the procedure and appendices, allowing Word to automatically create the table on completion of the procedure.

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Page 4

The procedure begins on page 4. The procedure shall be constructed in adherence with, and in the sequence identified in Appendix A – Compliance Procedure Elements.

Numbering and bullets, used to indicate the main elements and individual steps of a procedure, should not exceed 3 levels, e.g. 4.0, 4.1, and 4.1.1, within each section. This will help to eliminate excessive “white space” and confusion on the reader’s part. Appendix C – Procedure Writing Guidelines describes the process of creating procedure steps, mini procedures within a step, and the use of step numbering and bullets.

Each element of the procedure, i.e. Purpose, Responsibilities, etc, shall be numbered using the outlined number format described in Appendix A, Section 4. Each procedure main element and number will be formatted using Arial, Bold, and 12 pt font. The second, and all subsequent levels, of numbering will use Arial, Regular, and 12 pt font.

Appendices

Appendices to a procedure may, if subject to frequent and major revision, be developed independent of the main procedure. Independent development of appendix is often required when using a program other than Microsoft Word®, in that the data cannot be properly merged into a Word document. If however, all appendices to the procedure can be created in Microsoft Word®, and they are not subject to frequent or major changes, they should be included as part of the main procedure document.

If there are numerous appendices to a procedure and one or more of the appendices is created using another software program, all appendices should be developed independent of the main procedure document.

Independent appendices created using Microsoft Word® shall employ the same headers, colors and fonts as are used in the main procedure document. The footer for the appendix will use the same colors and fonts, and will include the SERC BCC Approval Date, aligned left. The right-aligned section of the footer will indicate the appendix designation, the current version of the procedure, e.g. Rev. 2 or Draft. The revision number of the appendix will be the same as that of the procedure proper, even if the appendix proper has not been revised. The page number and number of pages will be located directly below, as in the following example:

SERC BCC Approved: Month Day, Year

Appendix A, Rev. 2
Page 1 of 2

Note that in the example above, page numbering will not be a continuation of the procedure number, but will be independent to the appendix.

Appendix file names should consist of the main procedure number, appendix number and revision date, e.g. Procedure 1.1 Appendix A, Rev.2.

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Final Preparation for Posting

Approved [Director of Compliance] draft procedures and all appendices are forwarded to the Procedures Coordinator for final review and assembly in preparation for submission to the BCC for final approval. Simple procedures, with few or all Microsoft Word© appendices, will be merged into a new, single document for submission. The original procedure and all appendices will be retained as submitted to the Procedures Coordinator, to facilitate future revisions. Procedures with multiple, frequently revised or incompatible software appendices will be merged into a single PDF file for submission to the BCC.

BCC approved procedures and appendices, properly annotated by the Procedures Coordinator, will be merged into a single PDF file for posting on the SERC website or Compliance Server, as appropriate.

Appendix C: Procedure Writing Guidelines

Introduction

The major elements of a SERC Compliance Implementation Procedure are identified and defined in Appendix A: Compliance Procedure Elements. This document will focus on the processes and methods used to develop a clearly stated, step-by-step sequence of events that will accomplish the objectives of the procedure.

Preparation

The first step of writing a procedure is to determine the scope of the procedure. This is the big picture. What, in broad terms, does the procedure need to accomplish? The answer may be as simple as moving a bucket from point A to point B, if so, that is the scope of the procedure.

The next step is to create an outline of your procedure, leaving plenty of space between categories, which will help you to analyze everything that will be required to write a procedure that will get the job done properly and efficiently. Start your outline by stating the scope of the procedure.

Now, you need to dig a little deeper and include the results in your outline:

- Who is responsible for moving the bucket?
- How do they know they are responsible for moving the bucket?
- If they are out sick, who is responsible for moving the bucket?
- How do they know they are responsible for moving the bucket?
- Where did the bucket at point A come from?
- If the bucket is provided by more than one source, how many sources are there for getting a bucket at point A?
- What determines which source the bucket comes from?
- Is the bucket delivered?
- How is the bucket delivered?
- Is the bucket delivered by the same method from each possible source?
- What determines how the bucket is delivered?
- Can a single source deliver the bucket in multiple ways?
- How many ways can a bucket be delivered?
- Does the bucket have to be picked up from the source?
- How do we know that a bucket is ready to be picked up?
- If the bucket can't be picked up in the standard way, what is the alternative method?
- How do we know that we received all of the buckets that were delivered to point A?
- How do our sources know that we received all of the buckets?
- If the bucket is damaged, do we still pick it up? Do we need a separate **procedure**?
- If we pick up damaged buckets, who repairs them? Do we need a separate procedure?

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- If they can't repair the bucket, who does?
- Who determines if the bucket is not worth repairing?
- If that person is out, who makes the decision?
- How do we account for buckets damaged beyond repair? Do we need a separate procedure?
- How is a damaged bucket repaired? Do we need a separate procedure?
- If the bucket is dirty, do we still pick it up?
- If we pick up a dirty bucket, who cleans it?
- If they can't clean the bucket, who does?
- How is a dirty bucket cleaned? Do we need a separate procedure?
- How do bucket repairers or cleaners know they have a bucket to repair or clean? Do we need a separate procedure?
- How does a cleaned or repaired bucket get back in the system? Do we need a separate procedure?
- How do we know a bucket is ready to go back into the system?
- How do we account for buckets being cleaned or repaired?

DO WE HAVE A BUCKET YET? As you can see, even the simplest process procedure requires advanced planning. Let's say that we have a bucket:

- Does the bucket need to have anything in it when delivered to point B?
- Who fills the bucket?
- How do we move the bucket from point A to the fill point?
- From the fill point to point B?

The analysis continues for each process required to ensure that all of the buckets received at point A are delivered to point B, with the prescribed contents and in good condition, the agents at point B know that the buckets have been delivered and we have an accounting for all of the buckets.

The elements of a good procedure include:

- Assignment of responsibility,
- Assignment of responsibility when the original person/group cannot accomplish the task,
- Considering all of the major problems that could occur and establishing responsibility for making a decision when something out of the ordinary occurs,
- Ensuring that each change in responsibility is handed off and accounted for,
- Ensuring that the overall process and objective is being achieved,
- Establishing a system of checks and balances to ensure that the job is being done properly and that all materials and processes are accounted for,
- Procedure steps define each step of the process with sufficient detail, based on the frequency and difficulty of the task, to ensure that the job is properly completed,
- Establishing a process whereby suggestions for improvement and problems

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identified are reported to the proper level of management and acted upon.

- **Identifying Procedure Steps**

Procedure steps that are to be completed in a specific sequence will typically be sequentially numbered, following the hierarchy numbering sequence established in Appendix A: Compliance Procedure Elements. Example:

4.0 Procedure

4.1 Step 1

4.2 Step 2

4.2.1 Additional information about step 4.2 or a mini-procedure within the main procedure

In the above example, “4.0 Procedure” identifies the main element of the procedure. Sections 4.1 and 4.2 identify the sequential steps of the procedure. Section 4.2.1, can be used to provide additional information about step 4.2 or to identify a mini-procedure within the main procedure.

If at all possible, limit the levels of numbering to three levels, e.g. 4.0, 4.1 and 4.1.1, both to reduce confusion on the part of the reader, and to eliminate excessive white space in the document.

NOTE: For procedures that are lengthy, contain many steps and sub-steps, or that use a combination of numbering and bullets, turn off Automatic Numbered Lists and Automatic bulleted lists (See Microsoft Word© Help).

If your procedure requires that a series of steps be accomplished, but does not require that they are completed in an exact sequence, bullets should be used to identify the individual steps. Example:

4.0 Procedure

- Step 1
- Step 2
 - Additional information about step 2 or a mini-procedure within the main procedure

Alternatively, a bulleted format may be used for steps that are to be completed in exact sequential order if it is noted in a preceding statement that “the following steps must be completed in the exact sequence listed.” Example:

The following steps must be completed in the exact sequence listed:

- Complete step 1

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- Complete step 2

Writing the Procedure

Once you have determined the necessary steps for your procedure, the responsibility and requirement for each step must be defined and clearly stated in the sequence in which they will occur.

The first step in making a clear statement of exactly what must be done, is to alleviate any confusion as to whether completion of a step or series of steps in a process is mandatory or if there is some latitude for variation. Use of the words “shall” and “must” indicate that, without fail, the step or process is required to be completed. The words “will”, “may”, “could” and “should” leave room for user discretion, based upon the current situation, as to whether the step(s) are required to be completed.

Write the text in the third person, present tense, active voice. State in the procedure what *is* done, not what *must*, *shall* or *may* be done.

Avoid references to gender (“they, their” rather than “he, she”)

Define job titles or unusual terms the first time they appear, followed by the abbreviation in parentheses.

Write the numbers 1 through 9 in words within the text. Write the numbers 10 and greater in numerical form.

Limit each step in a procedure to one task. If the step requires several tasks, break the step into several steps or a mini-procedure within the main procedure. Start each step of the procedure with a verb describing what must be done, e.g. review, copy, and turn on, etc.

When several people perform a procedure together, identify who performs each step and how responsibility is passed among people performing the procedure. Identification of the person responsible for completing the step is made before stating the action taken. Example:

- The worker acknowledges completion of the job by signing at the bottom of the form,
- The worker delivers the completed form to the Supervisor,
- The Supervisor forwards the completed form to the Department Manager,
- The Department Manager logs the job complete in the software program.
- The Department Manager acknowledges logging the job by initialing the form,
- The Department Manager forwards the completed form to the Administrative Assistant for filing.
- The Administrative Assistant files completed forms in the monthly Completed Jobs

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file.

Present conditional information, cautions and notes before the procedure steps to which they pertain. The type of condition will be identified in all capital letters. Cautions will be all capital letters and bold font. Margins will be full width with numbering. Example:

- Turn the cooling water supply valve handwheel counterclockwise until it stops, fully opening the valve.

CAUTION: Do not turn the machine on unless the cooling water supply valve position indicator shows that the valve is fully open.

- Turn the machine control switch to the ON position.

Use language and detail appropriate to the staff performing the task and the frequency with which the task is performed. A higher level of detail is called for when:

- Task is infrequently performed,
- Many different people are involved,
- Little variation in performance can be allowed,
- Task is critical,
- Training is not comprehensive,
- Little time to practice.

Examples of detail level:

Gross:

Start the car.

Low:

Start the car

- Insert the key into the ignition switch
- Turn the key to start the engine.

Medium:

Start the car

- Insert the key into the ignition switch
- Rotate the key in a clockwise direction until the engine cranks
- Return the key to the ON position.

High:

- Open the car door
- Sit behind the steering wheel
- Fasten your seatbelt
- Verify that the shift lever is in the PARK position

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- Verify that the parking brake is set
- Insert the key into the ignition switch
- Rotate the key in a clockwise direction until the engine cranks
- Return the key to the ON position.

Mini-Procedures and Additional Information

Mini-procedures are used to enhance, or further describe major steps of a main procedure. For instance, you may be describing the process for starting a major piece of electrical equipment for which first time user needs additional instruction:

- 1.0 Start the machine:
 - 1.1 Verify that the control switch is in the OFF position.
 - 1.2 Close the disconnect switch.
 - 1.3 Turn the control switch to the ON position.
- 2.0 Begin work.

Additional information can be supplied to the user in the same manner as writing a mini-procedure, but should be bulleted instead of numbered:

- 1.0 Start the machine.
 - The unit will perform a set of self-diagnostics, requiring about 2 minutes, prior to starting.
- 2.0 Begin work.

Appendix D: SERC Abbreviations, Definitions, and Terms

1. Audit Team Leader (ATL) – Member of SERC staff designated with overall responsibility for conduct of a specific compliance audit.
2. Board Compliance Committee (BCC) – Committee vested with the full authority of the SERC Board of Directors for compliance related actions including review and approval of alleged violations, imposition of sanctions and penalties, and conduct of hearing for contested compliance issues.
3. Certification Statement – Cover letter format that allows for company officer signoff denoting certification that one or more submitted forms are accurate and complete.
4. Compliance Director (CD) – Individual with responsibility for overall direction and management of the SERC compliance program. Also termed Director of Compliance within certain procedures.
5. Compliance Enforcement Manager (CEM) – Manages compliance enforcement staff responsible for determinations of alleged violations, proposal of sanctions and penalties, and conduct of hearings for contested compliance issues.
6. Letter of Certification (LOC) – Compliance form that asks the entity a series of questions used to determine compliance to specific standards and requirements.
7. Manager of Compliance Audits (MCA) – Program manager with overall responsibility for compliance audits
8. Reporting Forms (RF) – Portal forms that allow an entity to submit specific requested data at predetermined timeframes.
9. Screener – member of SERC compliance staff designated with responsibility for performing an initial review of potential compliance issues to support prioritization and determine the need for prompt (48 hour) reporting and/or remedial action.
10. Self-certification – Simple form that allows an entity to declare compliance status. May include additional text fields to allow provision of supporting information.
11. Single Point of Contact (SPOC) – Member of SERC compliance staff designated with responsibility for a specific compliance action.
12. Subject Matter Expert (SME) – member of SERC staff designated as responsible for overall content of a procedure or series of procedures. The SME ensures accurate and complete content of procedures relative to CMEP requirements and integrates

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procedure comments / enhancements for future revisions.

Appendix E: Procedure Acknowledgement Form

Acknowledgement of Receipt of New or Revised Implementation Procedure

Implementation Procedure: [Procedure Number and Name]

Revision Number:

BCC Approved Date:

This is to acknowledge that I have received and reviewed a copy of the above named SERC Compliance Monitoring and Enforcement Plan (CMEP) Implementation Procedure or revision thereof. I understand that it contains important information defining the processes by which implementation of the associated section(s) of the SERC CMEP are to be followed. I will familiarize with the material in the procedure, and my conduct will be governed by its contents. I also understand that SERC may change, rescind, or add to any CMEP implementation procedure at its sole discretion, with or without prior notice.

Print full name

Signature

Date