

# **SERC Compliance Monitoring and Enforcement Program**

## **Implementation Procedure 1.4: Compliance Implementation Guidance Procedure**



## SERC CMEP Implementation Procedure 1.4: Compliance Implementation Guidance Procedure

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### Revision History

Revision	Date	Originator	Comments
0	February 14, 2008	T. Galloway and M. Ladrow	Document Origination.

### Responsible SERC Group(s)

SERC Board Compliance Committee (BCC)  
SERC Reliability Services Staff  
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.

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### 1.0 Purpose

This procedure defines the overall approach used by SERC staff to track requests by SERC registered entities to develop and communicate SERC staff interpretations of regional standards or supplements and for compliance implementation guidance on approved reliability standards.

### 2.0 Responsibilities

Director of Reliability Services (DRS) is responsible for:

- Directing Reliability Services staff in the development of the forms, processes and tracking systems required to ensure that SERC registered entities are:
  - Provided with prompt interpretations of Regional Standards and Supplements
  - Provided with compliance implementation guidance from the compliance organization.
- Coordinating with Compliance Director for Compliance Advisory Group (CAG), as required, and Reliability Services staff input in development of interpretation statements,
- Coordinating with Compliance staff in development and approval of compliance implementation guidance statements and coordination with other regions, as applicable,
- Ensuring that the Registered Entity is informed of the disposition of requested interpretations and compliance implementation guidance

Reliability Services Staff is responsible for:

- Screening of Registered Entity requests for Regional Standards and Supplements interpretations and compliance implementation guidance:
  - Ensuring adequate definition of the posed question,
  - Entering request into a Tracking System,
  - Making internal notifications required to ensure processing of Entity interpretation or implementation guidance requests.
- Reviewing in-process Standard and Supplement revisions and interpretations to determine if an answer to the guidance question is imminent and should be deferred to that action or processing continued,
- IF Reliability Services Staff finds the issue has not been addressed in past actions and is not being addressed in standards under development and the issue is compliance related, then the issue will be forwarded to the Compliance staff for development of a guidance statement.
- Coordinating with Compliance staff to ensure adequate review and approval of compliance implementation guidance issues,
- Ensuring that interpretations and compliance implementation guidance statements are posted on the SERC website.

Compliance Director (CD) is responsible for:

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- Coordinating Compliance staff review of validity of compliance implementation guidance issues,
- Coordination with CAG Chairmen in, as appropriate, processing and drafting of a position paper / implementation guidance,
- Determining the need for and obtaining input from cross-regional Regional Entity Compliance Managers (RECM) and Audit Observation Team (AOT),
- Coordinating input from other regions through the RECM,
- Review and approval of position paper / implementation guidance.

Manager of Compliance Audits (MCA) is responsible for:

- Coordinating cross-regional input through the AOT.

Guidance Coordinator (GC) is responsible for:

- Initial review of issues forwarded by Reliability Services and initial compliance determination of validity of compliance implementation guidance requests,
- Determining appropriate Subject Matter Expert (SME) for the issue and forwarding the issue to the same,
- Coordination between SME, CD, MCA, and CAGs in development of an implementation statement,
- Developing and initiating the necessary follow-up actions to address the issue identified, through appropriate channels, following either NERC or SERC standards development process. This could include developing and filing a SAR or an official request for interpretation.

Assigned Compliance staff is responsible for:

- Review and determination of validity of compliance implementation guidance requests:
  - Specific assignments will be made to Compliance Staff individuals who will be tasked with being the Standard Subject Matter Expert (SME) for particular Standards or Groups of Standards,
  - It is anticipated that the SME for a specific Standard will be familiar with revisions, in-process and previous interpretations, and other matters affecting that Standard,
- Review and determination of historical actions relevant to the particular implementation guidance requests,
- Leading development of the implementation guidance response.
- Coordinating, in conjunction with GC and CD, the appropriate CAGs, as needed, to develop position papers for guidance requests.

### 3.0 References

- 3.1 NERC Compliance Monitoring and Enforcement Procedure.
- 3.2 NERC Standards Development Procedure.

### 4.0 Procedure

Reliability Services develops and maintains forms and tracking processes to allow SERC registered entities to submit requests for interpretation of regional standards or supplements and, for compliance implementation guidance on approved reliability standards.

**NOTE: This request for interpretation must be non-frivolous and beyond the literal wording in the standard.**

- 4.1 SERC Registered Entity(ies) submits (Submitting Entity) a defined question on one of the above topics using the designated submittal form(s).
- 4.2 Reliability Services performs an initial screening to ensure the request contains all the required content and the question posed appears valid.
- 4.3 Reliability Services enters into the tracking system.
  - Reliability Services reviews in-process Standards and Supplements revisions and interpretations to determine if an answer to the posed question is imminent and should be deferred to that action.
- 4.4 IF the question pertains to compliance implementation guidance AND Reliability Services is unable to identify a resolution based on 4.3 above, Reliability Services arranges for a call / meeting with the GC and appropriate compliance staff to review the submittal.
- 4.5 GC reviews the submittal and with SME input determines the validity of the submittal. IF determined invalid, GC rejects with associated bases, and returns to Reliability Services for follow-up with the submitting entity.
- 4.6 IF the submittal is determined valid, GC so notes and directs the submittal to the appropriate SME.
- 4.7 SME reviews in-process Standards and Supplements revisions and interpretations to determine if an answer to the posed question is imminent and should be deferred to that action.
  - If no imminent resolution is identified in 4.7, above, SME requests that the issue be submitted to the applicable CAG and coordinates the development of an implementation guidance statement.
- 4.8 The applicable CAG Chairman designates lead individual(s) to draft a position paper / implementation guidance.
- 4.9 The CAG Chair coordinates review of the position paper / implementation guidance by other CAG members and issues an approved CAG recommendation to the GC.
  - SME and GC review the CAG recommendation for consistency

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- with past practices and other standards, as appropriate and reconfirms or coordinates revisions with CAG, if necessary.
- 4.10 GC presents the CAG-approved recommendation to the CD.
  - 4.11 CD or designee reviews the recommendation and determines need for cross-regional input via the RECM and AOT.
  - 4.12 If RECM cross-regional input is required, CD will coordinate with RECM.
  - 4.13 If AOT cross-regional input is required, MCA will coordinate with AOT.
  - 4.14 SME includes appropriate cross-regional input as directed by the CD.
  - 4.15 CD approves, or rejects the recommendation, as appropriate.
  - 4.16 CD or designee determines if a formal standards revision or interpretation is appropriate and, if so, directs the GC, in coordination with the SME, to prepare and submit appropriate requests.
  - 4.17 The CD will present approved implementation guidance statements to the BCC, for information purposes, prior to communication of the statement to the Submitting Entity and posting on the SERC website.
  - 4.18 The GC will coordinate with Reliability Services to communicate the resulting approved guidance to the Submitting Entity.
  - 4.19 The approved Compliance Implementation Guidance is posted for use via the SERC website and/or other appropriate methods.

**NOTE: Any guidance provided by SERC staff with or without the input of CAGs or other entities is to be followed strictly at the risk of the entity. No interpretation or compliance guidance can be considered binding unless such interpretation is developed as result of the processes outline in the NERC Standards Development Procedure and approved by FERC.**