

SERC Compliance Monitoring and Enforcement Program

Implementation Procedure 3.6 Periodic Data Submittals



SERC CMEP Implementation Procedure 3.6: Periodic Data Submittals

Revision History

Revision	Date	Originator	Comments
0	May 31, 2007	T. Galloway	Document Origination.
1	April 22, 2008	C. Sills	Updated to reflect 2008 compliance program.
2	April 13, 2009	C. Sills	Included more information regarding the filing schedule and notification to registered entities. Clarified the escalation process if an entity fails to submit the required filing. Added information related to Reliability Services and Reliability Assessments administering a subset of periodic data submittals. Removed timeframe for capturing assessment reports. Removed appendices.

Cross Reference Table

The procedures listed in the table below refer to this procedure, Compliance Implementation Procedure 3.6: Periodic Data Submittals. As revisions are made to Procedure 3.6, the Originator should review the procedures listed to determine if corresponding changes to these procedures are warranted.

Procedure Number	Procedure Title
5.0	Consolidated Compliance Enforcement Tracking

Responsible SERC Group(s)

SERC Board Compliance Committee (BCC)

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 Registered Entity and SERC Member reference.

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1.0 Purpose

Periodic data submittals are required per an established schedule as stated in applicable Reliability Standards, or as established by SERC in accordance with NERC Reliability Standards and Rules of Procedure.

Periodic Data Submittals are defined in the SERC CMEP as: Modeling, Studies, analyses, documents, procedures, methodologies, operating data, process information or other information to demonstrate compliance with Reliability Standards and provided by Registered Entities to the Compliance Enforcement Authority on a time frame required by a Reliability Standard or an ad hoc basis.

This procedure augments Section 3.6, “Periodic Data Submittals” of the SERC Compliance Monitoring and Enforcement Program (CMEP) document.

2.0 Responsibilities

The Compliance Director (CD) is responsible for:

- Determining the subset of Reliability Standards that require periodic data submittal and the associated filing schedule as part of the SERC Annual CMEP Implementation Plan.
- Developing data requirements and processes for handling and review of periodic data submittal reports to ensure conclusive determination of potential non-compliance(s) / alleged violation(s).
- Executing SERC compliance enforcement process proceedings with entities identified as having a potential non-compliance / alleged violation.
- Submitting a report to the Board Compliance Committee (BCC) for review on SERC compliance enforcement process actions and status for all entities identified as having potential non-compliance(s) / alleged violation(s).

The Compliance Enforcement Manager (CEM) is responsible for coordinating reviews of periodic data submittals to identify items of potential non-compliance(s) / alleged violation(s).

The Compliance Enforcement (CE) staff is responsible for:

- Developing new or revised forms, methods, and instructions for periodic data submittals required by the SERC Annual CMEP Implementation Plan in time to support scheduled filing.
- Providing periodic submittal filing requirements, schedules and instructions to Registered Entities required by the SERC Annual CMEP Implementation Plan in time to support scheduled submission dates.
- Reviewing submitted reporting forms to ensure all applicable Registered Entities have provided required data.

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- Reviewing submitted data to determine the existence of potential non-compliance(s) / alleged violation(s) and subsequent entry into the SERC compliance enforcement process.

Compliance Advisory Groups (CAGs) and Responsible SERC Subgroups (RSSs) may be used at the CD's request to provide input and/or develop draft submittal forms, data formats and submittal instructions and to support conclusive compliance determinations.

Reliability Services and Reliability Assessments staff is responsible for administering a subset of periodic data submittals necessary to carry out SERC's statutory functions other than compliance. These data submittals are generally identified in the SERC Filing Due Dates by Standard spreadsheet or are established as necessary under the NERC Rules of Procedure.

Registered Entities are responsible for:

- Completing applicable filing forms and, if applicable, certification statements in a timely manner per the established schedules.
 - Ensure periodic data submittals are completed as required by the region and notifying SERC if additional forms should be posted to the Portal.
- Retaining evidence to support the responses to the periodic data submittals, including any follow-up investigation, until the completion of the next scheduled audit, unless the NERC or Regional Entity advises otherwise.
- Responding to requests for additional data.

3.0 References

- SERC CMEP Section 3.6.

4.0 Procedure Steps

- The Compliance Director (CD) determines the subset of Reliability Standards that require Registered Entities to make periodic data submittals and the associated filing schedule as part of the SERC Annual CMEP Implementation Plan and transmits to the Directors of Reliability Services (RS) and Assessments (RA) for coordination.
- The CD directs new or revised data submittal requirements to the Compliance Enforcement Manager (CEM) by November 1st of each year (in conjunction with SERC filing the SERC Annual CMEP Implementation Plan with NERC), for development of required reporting forms and instructions for the following year.
- The CEM will assign one or more Compliance Engineers development tasks associated with the new or revised reporting forms. The Compliance Engineer is responsible for portal development, incorporating database elements and electronic forms to be posted on the SERC Portal.

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- The Compliance Engineer will post required filing schedules, submittal forms, compliance procedures and supporting information on the SERC website. Registered Entities will be notified and kept informed of changes and/or updates.
 - Compliance filing requirements and schedules will be posted to the SERC public website listing the Reliability Standards that require periodic data submittals, their requirements, applicable functions, reporting mechanism, and due dates.
 - The submittal forms will be posted to the Portal a minimum of fourteen (14) days prior to the due date for entity reporting.
 - If a filing deadline falls on a weekend the due date will be the next business day.

Note: Requests for data submittals will be issued to Registered Entities with at least the minimum advance notice period specified by the applicable Reliability Standard. If the Reliability Standard does not specify an advance notice period, the request will normally be issued with no less than twenty (20) days advance notice. The Registered Entity will provide the required information in the format as specified in the request.

- The general structure of data submittal forms, per standard, will be as follows:
 - Registered Entity contact
 - Confidentiality statement
 - Supporting questions (at the standard requirement level) and/or data used as basis for determination of compliance.
- When required, certification statements, signed by an Authorized Signatory, affirming the contents of the data submittal form shall be electronically signed prior to submission of the associated data submittal form.
- Within five (5) business days of the required submittal deadline, the Compliance Engineer will follow-up, as needed, to ensure all applicable Registered Entities have submitted required data submittal(s).
 - The Compliance Engineer will develop a report that identifies each Registered Entity that has failed to complete a data submittal by the required deadline.
 - Failure of a Registered Entity to submit requested data by the filing deadline will result in an escalation of the enforcement process as described in SERC Implementing Procedure 5.0: Consolidated Compliance Enforcement Tracking.

Note: For Periodic Data Submittals administered by RS and/or RA, the initial data validation and follow-up (if necessary) will be made by RS and/or RA. RS and/or RA will notify the Compliance Director for escalation of any Registered Entity that has failed to complete a required data submittal.

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- Data submittal forms are typically locked out for filing one (1) day after the required due date for submittals filed monthly and quarterly. Data submittal forms are typically locked out for filing fourteen (14) days after the required due date for submittals filed semi-annually or annually. Entities not having completed submission by this date must contact SERC CE staff for access to the forms for filing.
- The Compliance Engineer will initiate queries and develop reports to aid the CE Staff in reviewing content of data submittals.
- Data submittal reports are forwarded to the CEM for coordination of staff review. CE staff will review the submitted information to determine compliance with the Reliability Standard and may request the entity to provide additional data and/or information for a complete assessment or to demonstrate compliance.

Note: For Periodic Data Submittals administered by RS and/or RA, any potential non-compliance or alleged violations remaining after data validation will be reported to the Compliance Director.

- Upon completion of the CE Staff review, the CEM directs entry of any potential non-compliance(s) / alleged violation(s) into the Compliance Database Tracking system and processes them for a determination of alleged violation in accordance with SERC Implementation Procedure 5.0, Consolidated Compliance Enforcement Tracking.

Note: Registered Entities identified as having a potential non-compliance / alleged violation related to a Periodic Data Submittal draft report will be provided an opportunity to provide input and submit comments in accordance with SERC Implementation Procedure 5.0, Consolidated Compliance Enforcement Tracking.

- Data submittal reports with no non-compliance(s) / alleged violation(s) indicated are forwarded to the CEM for compilation of bulk SERC data submittals and/or filing in accordance with SERC Implementation Procedure 9.0: Data Retention and Confidentiality.
- The CD will submit a report on SERC compliance enforcement actions and status for all entities with potential non-compliance(s) / alleged violation(s) to the BCC for review.
- If no potential non-compliance(s) / alleged violation(s) are found, this process generally completes within thirty (30) business days of SERC's receipt of data.