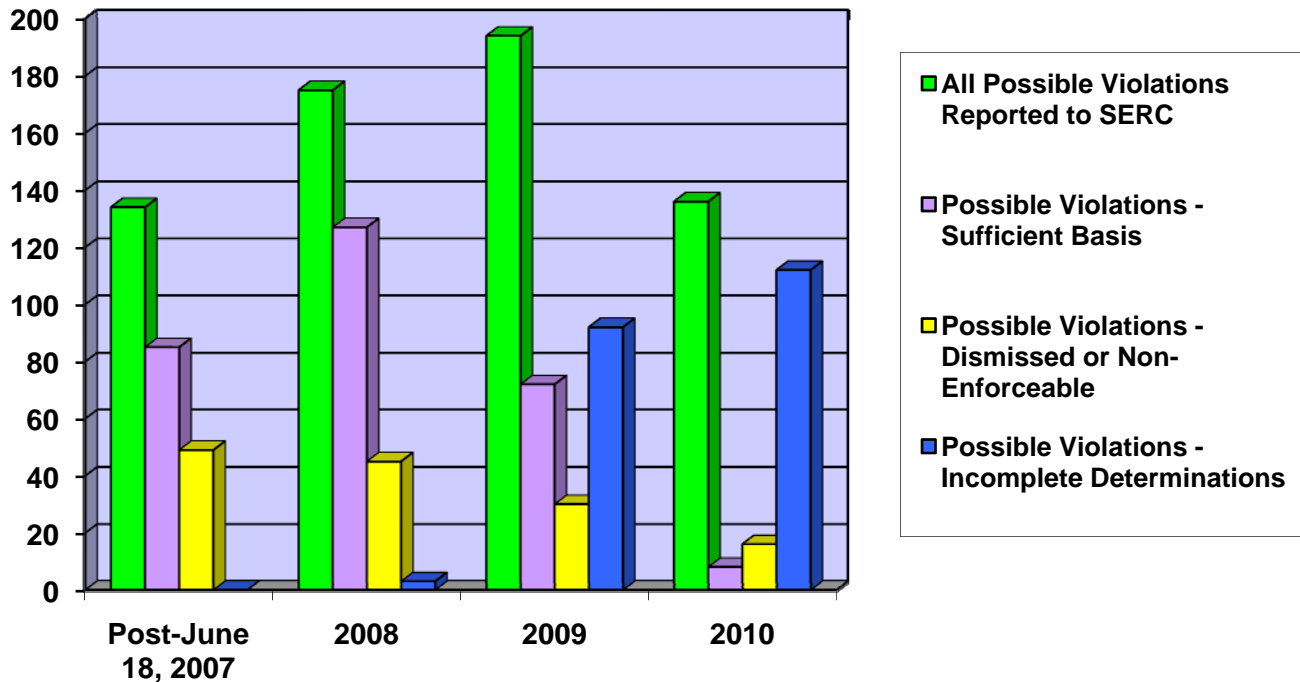


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COMPLIANCE STATISTICS (POST JUNE 18, 2007 THROUGH JUNE 21, 2010)

*All Possible Violations Reported to Region as of June 21, 2010 **



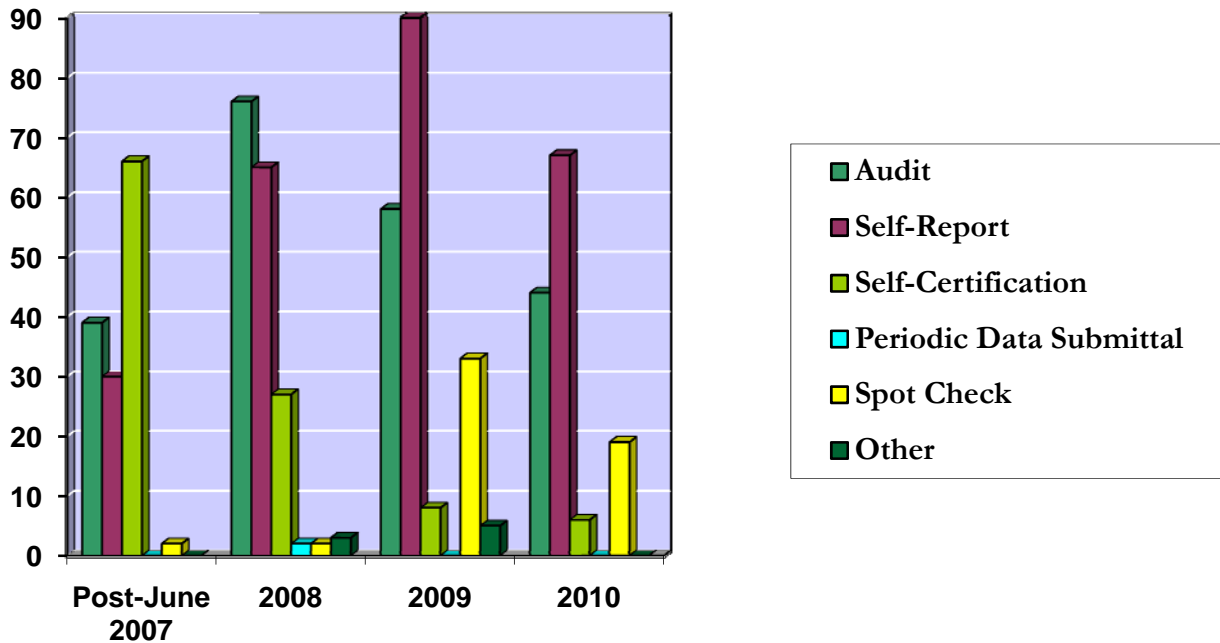
	Post June 18, 2007	2008	2009	2010
All Possible Violations Reported to SERC	134	175	194	136
Possible Violations Sufficient Basis – Determination Complete	83	127	72	8
Possible Violations Dismissed or Non-Enforceable	51	45	30	16
Possible Violations with incomplete determinations	0	3	92	112

50 of the incomplete determinations in 2009 are CIP-002 through CIP-009

A few remaining 2008 issue determinations have not yet been completed.

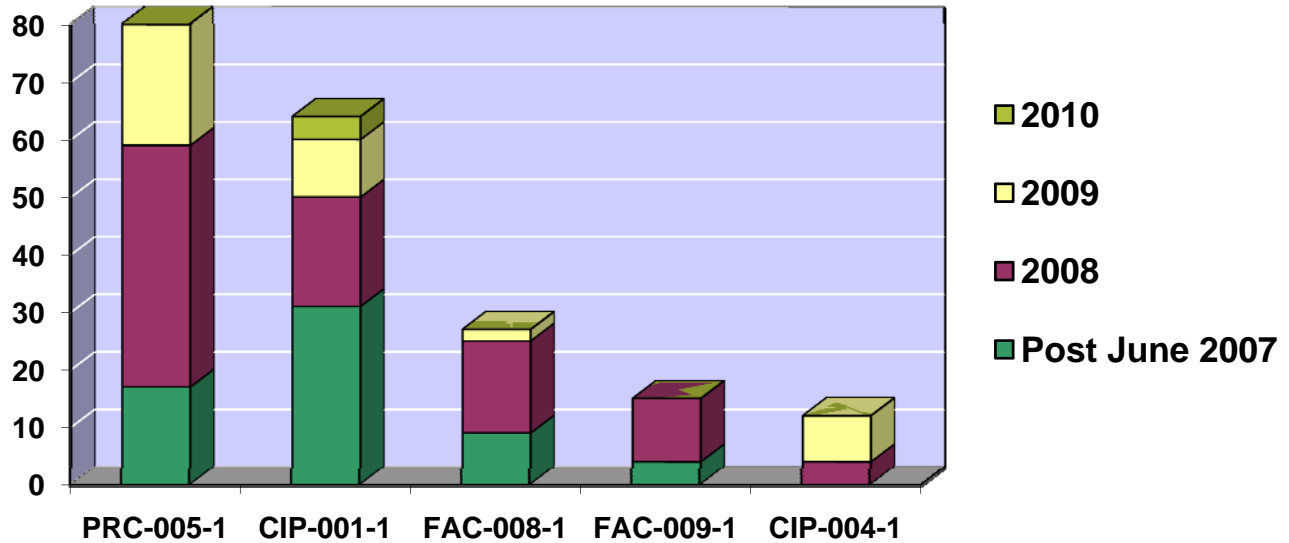
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Monitoring Sources for Possible Violations by Requirement as of June 21, 2010*



	Post-June 2007	2008	2009	2010
Audit	39	76	58	44
Self-Reporting	30	65	90	67
Self-Certification	66	27	8	6
Periodic Data Submittal	0	2	0	0
Spot Check	2	2	33	19
Other	0	3	5	0
Totals	137	175	194	136

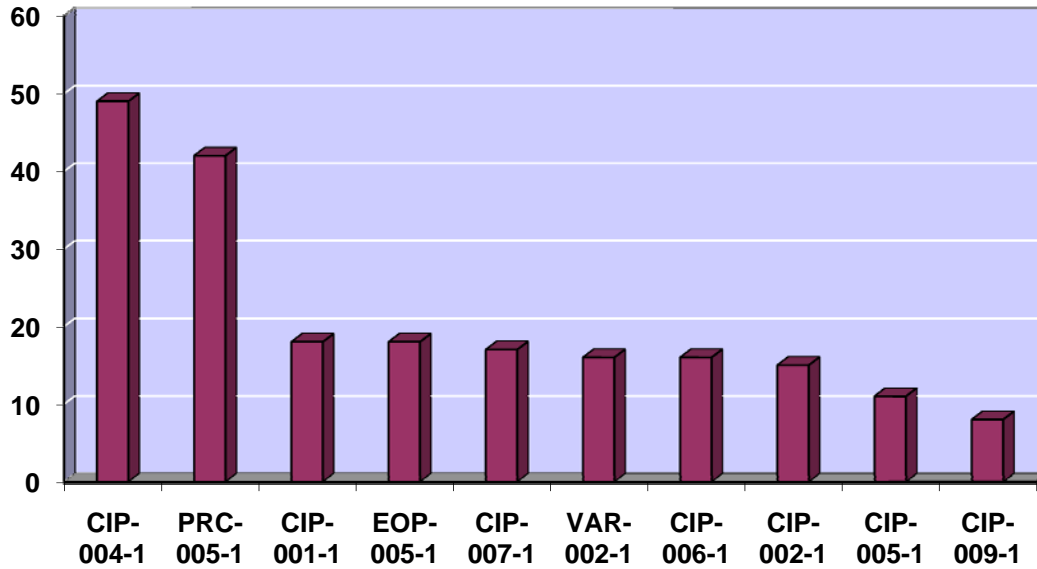
Top 5 Post-June Violations Reported by Standard



Top 5 Post-June Possible Violations Reported by Standard and Requirement and Deemed to Have Sufficient Basis – Determination Complete as of June 21, 2010

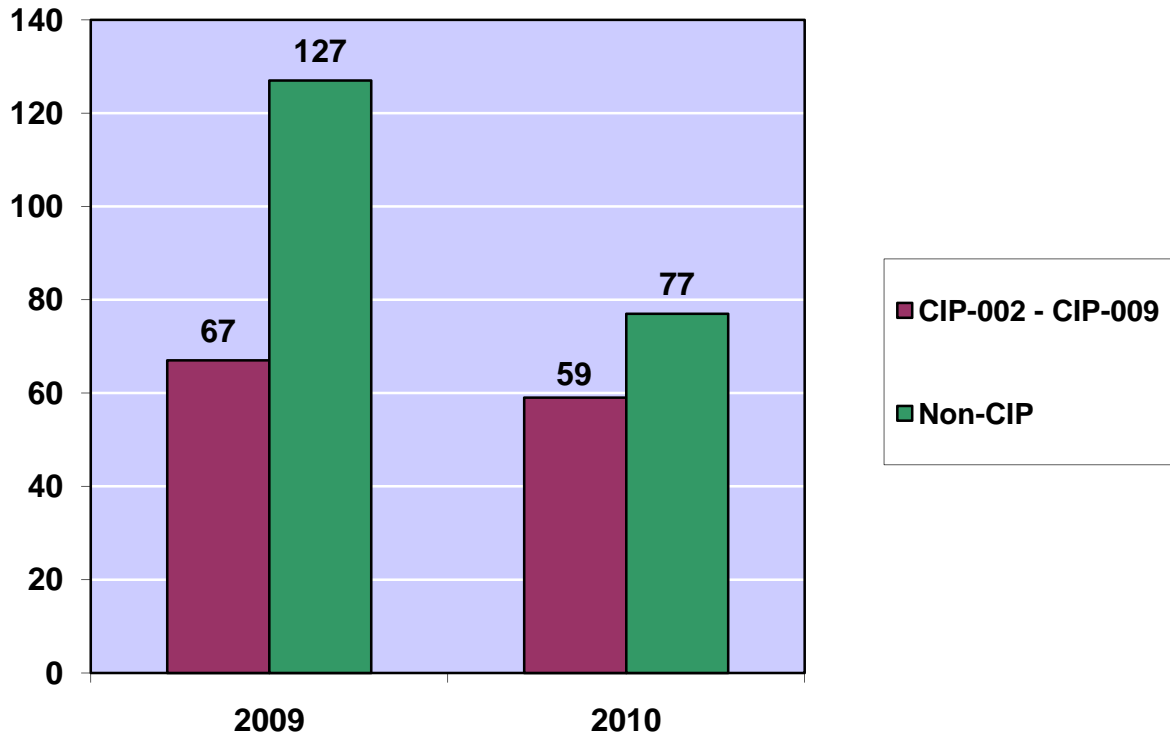
Standard, Requirement	Post-June 2007	2008	2009	2010
CIP-001-1				
R1	7	6	3	1
R2	7	4	2	1
R3	7	4	2	1
R4	10	5	3	1
PRC-005-1				
R1	14	22	8	1
R2	3	20	18	0
FAC-008-1				
R1	9	16	2	0
FAC-009-1				
R1	3	11	0	0
R2	1	0	0	0
CIP-004-1				
R2	0	1	4	0
R3	0	1	1	0
R4	0	2	3	0

Top 10 Possible Violations Reported to the Region over past 12 months



Standard	Possible Violations
CIP-004-1	49
PRC-005-1	42
CIP-001-1	18
EOP-005-1	18
CIP-007-1	17
VAR-002-1	16
CIP-006	16
CIP-002-1	15
CIP-005-1	11
CIP-009-1	8

Cumulative Possible Violations Reported in 2009 and 2010 YTD. CIP-002 through CIP-009 versus Non-CIP.

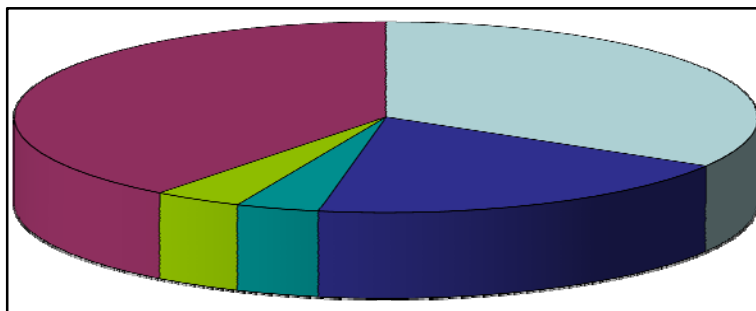


Recently, there has been a large increase of possible violations identified for the CIP Standards (CIP-002 through CIP-009). Of the 194 possible violations reported to SERC in 2009, approximately 34% involved compliance with CIP-002 through 009. In 2010, approximately 43% of the possible violations identified to involve CIP-002 through 009. Most of the CIP possible violations are still in the “determination” state. These possible violations are more complex and require specific expertise. The scope of CIP possible violations is expected to increase as more entities reach “compliant” dates.

Note that possible violations of CIP-001 are included in the Non-CIP category.

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Mitigation Plan Status for 2008, 2009, and 2010 Possible Violations Reported to NERC as of June 21, 2010



- Region Awaiting MP
- Region Reviewing MP
- Entity Implementing
- Region Validating Closure
- Mitigation Fully Executed

Region Awaiting MP	Region Reviewing MP	Entity Implementing	Region Validating Closure	Mitigation Fully Executed	Total MP
139	80	15	16	164	414

- This table includes Mitigation Plans that the region has not completed the determination.

Mitigation Plan News

With the launch of CITS (Compliance Issue Tracking System) and the assignment of John Wolfmeyer as the Mitigation Plan process leader, SERC now can offer entities an opportunity to have draft mitigation plans reviewed prior to formal submittal.

Mitigation Plans may be entered using the form available on the SERC portal and saved to the portal without actually submitting it to SERC. If an entity would like to have SERC staff review the draft to ensure it meets the guidelines for submission, just send an email to jwolfmeyer@serc1.org to request a review. John will review the saved mitigation plan using the acceptance criteria and will let you know if any changes will be required or suggested. Note that John's review does not constitute acceptance or approval by SERC, it will only provide some confidence that the form and content are adequate for submittal.



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SERC Guidelines for Submission of Mitigation Plans

To assist entities in preparation of an acceptable Mitigation Plan, submission guidelines can be found on the SERC public website in the Compliance section under the Mitigation Plan Submittal Form link. The link to the guidance document is listed below:

<http://www.serc1.org/Documents/Compliance/Compliance%20Implementation/SERC%20Guidelines%20for%20Mitigation%20Plan%20Submission.pdf>

Please note that this document is being revised to address the portal-based forms that are now in use for submitting a mitigation plan, but the advice provided concerning how to complete the forms is still valid.

Mitigation Plan Completion Dates

SERC Compliance Staff reminds Registered Entities who are preparing or completing Mitigation Plans that there is a high degree of importance attached to the dates the Registered Entity identifies as the date upon which the Mitigation Plan will be completed. The date specified for completion on the Mitigation Plan is deemed a significant contractual obligation of the Registered Entity, reflecting when the possible or alleged violation will be remedied and risk to reliability of the bulk-power system will be alleviated. Failure to complete the Mitigation Plan on or by that date can result in additional compliance enforcement actions and additional penalties may be applied.

For that reason, care should be taken to establish a completion date that will restore compliance within a reasonable period and also accommodate any internal review and approval processes that will be necessary to complete the plan. SERC Compliance Staff discourages establishing a completion date that falls on a Friday, weekend, or holiday. There have been a number of cases in which a Registered Entity had specified a Friday, weekend or holiday date as its Mitigation Plan completion date and, because of unavailability of individuals to finalize execution of required action or approve required policies or procedural documents, was unable to complete its Mitigation Plan on time. SERC Compliance Staff also reminds Registered Entities not to wait until the last several days prior to the specified Mitigation Plan completion date before finalizing actions, such as conducting required training and obtaining executive sign off of required documents, in the event unexpected absences prevent timely completion.

If, despite appropriate considerations, it appears that an extension of the specified Mitigation Plan closure date is necessary, the extension request must be made at least five business days before the date specified on the Mitigation Plan (see CMEP 6.0). Extension requests must state the basis for the delay in completion. SERC will approve requests for an extension on a case-by-case basis if it determines the need for the extension is justified, taking into account the scope of the issue being mitigated, the length of the requested delay in completion, the evidence in support of extension, and the potential risk to reliability of the bulk-power system.

General Support:

For additional Lessons Learned and other support documents for strengthening your overall compliance program, please visit the Regional Entity Common Web Compliance tab at <http://www.regionalentities.org/ComplianceHome.aspx>. The lessons learned section is under the CIMG tab and information on attributes of a good compliance program is under the RCIG tab.



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General Observations and Lessons Learned for 2010:

June Featured Standard:

Each month, SERC staff will feature a specific Standard or guidance in this section. If there is a Standard that you would like to see featured, please email serccomply@serc1.org.

The June feature is a response to an entity question regarding guidance on MOD-025.

Q) Describe the expectations of GO/GOPs in the completion of MOD-025 reporting forms on the SERC portal. I heard during the last SERC Open Forum that verification testing is not necessarily required, but testing is required according to the SERC Supplement (for non-exempt generators). Any additional information regarding SERC's expectations would be appreciated

A) The SERC Supplement Verification of Generator Real and Reactive Power Capability for NERC Reliability Standards MOD-024 and MOD-025 states various methods for the validation of generator capability. Testing of generator capability is listed as one of the many methods of validation, but it is not specifically required by the supplement. The supplement outlines how verification of capability and reporting on the verification will be accomplished. The reporting portion is accomplished through the forms on the portal. See the extract from the supplement included below. The supplement states that 20% of generator gross and net reactive power capability must be verified every year within a five year period. Proof that verification of reactive capability has been occurring in accordance with the supplement since 2008. SERC has collected this information from entities since 2008 for use in its reliability assessments.

The language of the supplement is as follows: *The gross and net reactive capability for all existing non-exempt generators will be validated. The gross and net continuous capability for all new generating equipment will be validated and reported upon commissioning. The gross and net continuous capability for all generating equipment will be validated again and reported when there is a long-term plant configuration change, following a major equipment modification, power system topology changes, or as agreed to by the Planning Coordinator and/or Transmission Planner, as appropriate, and Generator Owner. Data may be collected either during routine operation of the unit or special test, provided that the general and specific requirements herein are met. The assigned capability for all the units will be confirmed yearly.* (Supplement at Section III D1b)

In addition, the SERC Generator Subcommittee and the SERC Dynamics Review Subcommittee are discussing interpretations of the supplement in order to help give guidance as to how entities can be responsive to the standard.

Note:

The April feature provided guidance on TFEs for CIP-007-2 R5.3. Since then, there has been additional discussion among the regions and NERC regarding this standard since this guidance was issued.

NERC and the Regions are presently engaged in developing a clarification statement regarding this sub-requirement to be issued to the public.

CIP-007-2 – Cyber Security – System Security Management

Case 1

R4. Malicious Software Prevention — *The Responsible Entity shall use anti-virus software and other malicious software (“malware”) prevention tools, where technically feasible, to detect, prevent, deter, and mitigate the introduction, exposure, and propagation of malware on all Cyber Assets within the Electronic Security Perimeter(s).*

R4.1. *The Responsible Entity shall document and implement anti-virus and malware prevention tools. In the case where anti-virus software and malware prevention tools are not installed, the Responsible Entity shall document compensating measure(s) applied to mitigate risk exposure or an acceptance of risk.*

Several SERC Registered Entities have felt that, since it is generally known and accepted that certain Cyber Assets (e.g., network switches, routers, firewalls, etc.) do not support Malware/AV Software, it was not necessary to file a TFE. Even in this case, the entity is required to file a TFE identifying the extent and the compensating measures.

Case 2

R5. Account Management — *The Responsible Entity shall establish, implement, and document technical and procedural controls that enforce access authentication of, and accountability for, all user activity, and that minimize the risk of unauthorized system access.*

R5.3. *At a minimum, the Responsible Entity shall require and use passwords, subject to the following, as technically feasible:*

R5.3.1. *Each password shall be a minimum of six characters.*

R5.3.2. *Each password shall consist of a combination of alpha, numeric, and “special” characters.*

R5.3.3. *Each password shall be changed at least annually, or more frequently based on risk.*

Several SERC Registered Entities have felt that it was not necessary to file a TFE when a technical control is unavailable, but procedural controls have been established. Even in this case, the entity is required to file a TFE identifying which requirements cannot be technically enforced and the compensating measures.

SERC has also found instances where Registered Entities felt that their password controls (both technical and procedural) are stricter than the standard (i.e., R5.3.2) but are unable to meet the exact words of the standard. If the entity is unable to meet the exact words in the requirement, the entity should request a TFE even if their password controls are deemed stricter than the standard.

General Observations and Lessons Learned in 2010:

CIP-002-1 – Cyber Security – Critical Cyber Asset Identification

R2. Critical Asset Identification – The Responsible Entity shall develop a list of its identified Critical Assets determined through an annual application of the risk-based assessment methodology required in R1. The Responsible Entity shall review this list at least annually, and update it as necessary.

Recently, several SERC Registered Entities have felt that, since nothing has changed on their systems, there was no reason to execute their risk-based assessment. Even in this case, the entity is required to perform the annual application of their risk-based assessment and document those results even if it is a null-list.

R4. Annual Approval — A senior manager or delegate(s) shall approve annually the list of Critical Assets and the list of Critical Cyber Assets. Based on Requirements R1, R2, and R3 the Responsible Entity may determine that it has no Critical Assets or Critical Cyber Assets. The Responsible Entity shall keep a signed and dated record of the senior manager or delegate(s)'s approval of the list of Critical Assets and the list of Critical Cyber Assets (even if such lists are null.)

SERC has seen instances where an entity has failed to have a senior manager or delegate(s) approve the entity's Critical Assets and Critical Cyber Assets list annually. This must be done even if these lists have not changed.

FAC-008-1 and FAC-009-1

In instances where the audit team finds a flaw in an Entity's Facility Rating Methodology (FRM) under FAC-008-1 and that flawed methodology is applied as required in FAC-009-1, the audit team does not flag FAC-009-1 as being in possible violation when a documented FRM has been applied as required by Entity's FRM. The audit team will flag FAC-009-1 as a possible violation if a documented FRM is not applied as written.

Entities found in violation of FAC-008-1 are required to revise their FAC-009-1 ratings to be consistent with their corrected methodology as part of their mitigation of the violation of FAC-008-1.

Entities are strongly encouraged to ensure that their Facility Ratings are properly communicated to the appropriate entities, without request from these entities, after correcting a flawed FRM.

PRC-005 R1

"Maintenance Free" Batteries

For decades, the "flooded" battery and variations of it have been used in substations and power plants to provide electrical power to control circuits, emergency equipment, and other special needs. For years, it has been well understood that these batteries need periodic maintenance to ensure they were able to perform their designed purpose when called upon to do so.

Battery technology has evolved to include a variety of "maintenance free" batteries and some entities are installing these batteries as replacements for common flooded batteries that have reached their end of useful life.

SERC staff would like to caution those entities that the designation "maintenance free" is a somewhat of a misnomer in that less maintenance and testing may be required for new battery

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designs, but battery manufacturers may still require a certain amount of periodic maintenance, inspection, and testing. In addition, if the entity references IEEE standards in its Protection System maintenance and testing program, they should be sure that the appropriate sections of the standard are referenced and specific activities (such as addition of water, measurement of cell specific gravity) are not inadvertently included in the program if they are not necessary. In brief, when you change the batteries, be sure your maintenance and testing program is changed to be consistent with the installed battery types.

PRC-005 R2

If a potential violation of PRC-005 R2 is identified by any discovery method, Entity should be prepared provide to SERC staff assessing the violation, information regarding their Protection System which should include:

- The number of devices in each of the defined elements of the Protection System - Protective relays, associated communication systems, voltage and current sensing devices, station batteries and DC control circuitry.
- Evidence that all Protection System devices were maintained and tested within the defined intervals (R2.1.). For each type of device, indicate the total number of instances that evidence was missing.
- Evidence of date each Protection System device was last tested/maintained (R2.2.)
- For each test interval missed on each device, describe the condition of the device during the test interval immediately **prior** to the missed test interval. Specifically, was the device working and in good condition during the test interval immediately prior to the missed test interval? In addition, for each test interval missed on each device, describe the condition of the device during the test interval immediately **following** the missed test interval.
- Provide a copy of the Maintenance and Testing Program in place at the time the possible violation occurred.

General Observations and Lessons Learned in 2009:

CIP-001-1 (Sabotage Reporting)

- Requirement 1 - Failure to include process for identification of sabotage
- Requirements 1 and 3 – Entity procedures don't address lateral or downward communication of a sabotage event (providing operating personnel with response guidelines and making operating personnel aware of events - communication across organization rather than just to law enforcement authorities and management). Anyone in an organization could receive a threat or notice of a sabotage event. All operating personnel must be aware of the procedure for communicating the threat to the proper personnel. Communication of an event or threat must be made to all operating personnel and to neighboring entities, as applicable.
- Requirement 4 – No evidence that contact has been established with the FBI for purposes of reporting sabotage events. Some entities are confused because their first responders are local authorities (Sheriff, Local Police), not the FBI. Contact must be established with the FBI, as well as the local authorities. The FBI may direct that local

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authorities be contacted, who will in turn contact the FBI; but this direction must be documented. New guidance has been issued from NERC regarding this requirement. The guidance is located in the updated Reliability Standard Audit Worksheet (RSAW) for CIP-001-1 R4.

CIP-004-1 (Personnel & Training)

The Regional Compliance Implementation Group (RCIG) has recently posted a white paper detailing the *RCIG Assessment on Monitoring and Implementation of Reliability Standard CIP-004-1 Cyber Security – Personnel and Training*. The white paper is posted on the Regional Entity Common Website at the following link:

<http://www.regionalentities.org/Documents/Compliance/RCIG/RCIG%20Assessment%20CIP-004.pdf>

SERC has reviewed possible violations on CIP-004 R4:

- Several reasons entities have not adequately maintained the physical and electronic access lists and access rights according to the standard are:
 - The official report, that lists who has access, fails to list everyone that has access. Due to the omissions, Entity thought certain individuals did not have access when in fact the individuals still had access.
 - Entity software to automatically remove access to an individual when they no longer worked in a secure area failed to work properly and the access was not revoked on time.
 - Entity failed to consider all access methods into a secured area. Individuals with master keys to gain emergency access to secure areas were not properly accounted for.
 - Entity revoked access by manually confiscating access cards. Due to logistics, not all access cards were confiscated within the time allowed.

Clarification on CIP-004 R4 and the possible overlap of the two sub-requirements

R4.1 states:

“The Responsible Entity shall review the list(s) of its personnel who have such access to Critical Cyber Assets quarterly, and update the list(s) within seven calendar days of any change of personnel with such access to Critical Cyber Assets...”

R4.2 states:

“The Responsible Entity shall revoke such access to Critical Cyber Assets ...within seven calendar days for personnel who no longer require such access to Critical Cyber Assets.”

Question: Can an entity rely solely on the quarterly review of the access lists (that is required in R4.1) to identify personnel that no longer require Critical Cyber Access and then revoke their access within seven days of the quarterly review and be compliant with R4.2?

Response: An entity cannot rely solely on the quarterly review for identifying personnel that no longer require access. Where the date that an individual no longer needs access is known, e.g. retirement date, resignation date, transfer date, promotion date, etc. then the access to Critical Cyber assets must be revoked within 7 days of that known date.

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The quarterly review is intended to identify personnel, who no longer need access, but did not have a specific date associated with no longer needing access. For example, a person was given physical access to the control center, but during the quarterly review it was discovered that the person has never used that access and per the company's Corporate Security Policy, anyone not using their access during the previous quarter will have that access revoked. This access needs to be revoked within 7 days of the quarterly review.

For an official interpretation a request needs to be submitted to NERC.

FAC-008-1 (Facility Rating Methodology)

Examples of deficiencies identified with respect to FAC-008 include:

- Entity could not produce a written Facility Rating Methodology, for its solely and jointly owned Facilities
- Entity's Facility Rating Methodology did not include a statement that a Facility Rating shall equal the most limiting applicable Equipment Rating of the individual equipment that comprises that Facility
- The scope of equipment addressed by the Facility Rating Methodology did not include all equipment used to create and transmit electric power (e.g., for Generator Owners, beginning with the generator and considering generator auxiliaries such as excitation equipment, through the facilities point of interconnection or demarcation, whichever is greater)
- The Facility Rating Methodology did not address both the normal and emergency ratings, if applicable, and a statement explaining that both ratings are the same and why
- The Facility Rating Methodology did not identify how the following items (from R1.3 are considered:
 - the source of the ratings for individual equipment (design criteria, nameplate ratings, etc),
 - how equipment ratings are affected by ambient temperatures, or a statement indicating that the equipment is not affected, if applicable
 - operating limitations of the equipment,
 - a listing of other assumptions, or a statement that no assumptions were made

PRC-001-1 — System Protection Coordination

R1. Each Transmission Operator, Balancing Authority, and Generator Operator shall be familiar with the purpose and limitations of protection system schemes applied in its area.

SERC will enforce this issue at the operator level – expecting the actual operator or an on-shift supervisor to have sufficient knowledge of the purpose and limitations of the protection system schemes applied in its area to ensure an appropriate action or non-action is taken in response to a relay operation in its area.

PRC-005-1 (Transmission and Generation Protection System Maintenance and Testing)

The Regional Compliance Implementation Group (RCIG) has recently posted a white paper detailing the *RCIG Assessment on Monitoring and Implementation of Reliability Standard PRC-005-1 Transmission and Generation Protection System Maintenance and Testing.*

The white paper is posted on the Regional Entity Common Website at the following link:

<http://www.regionaleentities.org/RegionalComplianceImplementationGroup.aspx>

PRC-005-1- General Guidance

Review your PRC-005 Transmission and Generation Protection System Maintenance and Testing procedure and verify that you have included **all** five of the required elements of a Protection System --- protective relays, associated communication systems, voltage and current sensing devices, station batteries and DC control circuitry --- or clearly state “not applicable,” and any reasons why not.

Your procedure must also include maintenance and testing intervals and their basis, a summary of maintenance and testing procedures, as well as evidence (including dates) that they were last maintained and tested with-in the defined intervals.

Key issues identified in the implementation of PRC-005

- R1 & R2- Failure to recognize definition of “Protection System” (from Glossary) and failure to include all aspects of all equipment included in definition
- Failure to provide documentation that each class of equipment was receiving maintenance at the specified interval.

Secondary issue identified in the implementation of PRC-005

- R1- Missing summary of maintenance and testing procedures and/or basis for each maintenance interval

Issues to be mindful of in regard to PRC-005-1 R1:

- Maintenance and Testing Intervals- Periodicity
- Basis- Can you document why you picked this particular interval?
 - Manufacturer recommended
 - Experience
 - Other
- Summary of Maintenance and Testing Procedures
 - Synopsis of work to be performed

Issues to be mindful of in regard to PRC-005-1 R2:

- Evidence Protection System devices were maintained and tested
 - Invoices
 - Work management entry
 - Processed work orders
 - Relay and battery test sheets
- Date maintained

PRC-005 Entity Example of Lesson Learned - Relay Review

Details of Review Performed:

Entity conducted a detailed review of the protective relaying systems installed on all generators to ensure that all relays that should be within the scope of the Protection System maintenance and testing program had been identified. This review was conducted in response to a recent discovery that several medium to low voltage transformer protective relays had the ability to trip

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the generator through unit lockout relays. Typically, this protective relay application would sever the power source to any fault it detects by tripping a medium voltage circuit breaker and would not have the potential to affect the reliability of the bulk-power system. This particular location's design did not include this disconnect means, so isolation of the faulted section of the power distribution system monitored by this relay would be accomplished by tripping the generator. The review of the protective relaying systems included specifically looking for any other similarly designed plants to check for any inadvertent omission of protective relays with similar tripping. In addition, every installed protective relay was individually considered to determine if it had the potential to affect the reliability of the bulk-power system. The scope of the review included generator protective relaying, generator step-up transformer protective relaying, and unit auxiliary station service transformer protective relaying which, if operative, will result in the loss of generation. Each relay application was reviewed to determine what equipment may be tripped by the relay. This equipment could include the generator, the main bank, the running bank, or the station service buses. Where the tripping schematics, relay connection, or relay functions were not clearly known, research into the plant/unit specific elementary diagrams was conducted. Plant and transmission single line diagrams for all units mentioned above were reviewed where there was uncertainty as to their configuration to ensure that the protective relay listing is complete.

A team of six electrical engineers spent 600 hours reviewing the single line diagrams, elementary diagrams, relay applications, PEDs databases and relay indices. The goal of the review was to ensure that the relay classifications are consistent with Protection System maintenance and testing program. Protective relays are classified pursuant to the Protection System maintenance and testing program in accordance with their potential to affect the reliability of the bulk-power system. A secondary goal of the review was to ensure that the basis for determining the scope of the affected relays is equally applied at all plants.

Lessons Learned:

- Consider any station service protective relaying that can trip the unit either directly or indirectly using lockout relays.
- If there is no isolating circuit device between the equipment being protected and the generator terminals, a study of the tripping elementary diagram is indicated to verify unit lockout and shutdown capability.
- Physical inspection may be necessary to confirm the drawing accuracy.
- Be sure to read the SERC Maintenance and Testing Supplement to determine which Protections Systems are covered by PRC-005.
- Rule of Thumb – If any device can remove generation or transmission capability from the Bulk Electric System without operator action, it probably should be included in the scope of your Protective System program.

Battery Maintenance and PRC-005-1 R2

Recently, SERC Reliability Corporation has seen a spate of self-reports regarding station batteries that are included in the definition of Protection Systems as included in the NERC Glossary. In each case, the batteries at certain facilities (primarily registered Generator Owners) were not being maintained within the intervals specified by entity's maintenance program. In short, the problem appears to be a lack of clear understanding of the reliability requirements at differing levels of the organizations involved.



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The NERC Glossary of Terms used in Reliability Standards defines Protection Systems as “Protective relays, associated communication systems, voltage and current sensing devices, station batteries and DC control circuitry.” Typically, maintenance of batteries occurs with multiple periodicity; often weekly, monthly, quarterly, and annually. The subject self-reports all dealt with entities where maintenance personnel were not performing all or were not performing within the defined intervals all the maintenance required by entity’s preventative maintenance program. In other cases the documentation of the battery maintenance performance within the specified intervals was not sufficient to support compliance with the requirements. SERC Staff determined from communications with entity, that apparently the requirements contained within the Reliability Standards were not adequately communicated to individuals actually responsible for the oversight and execution of the maintenance activities, often in locations other than a corporate office.

SERC Staff has observed a mitigating action for these violations has been for the individuals responsible for disseminating the requirements of PRC-005-1 to personnel reiterate to the individuals actually responsible for the oversight and execution of the maintenance activities that the standard requires “Evidence Protection System devices were maintained and tested **within the defined intervals.**” [emphasis added]. These actions also included ensuring the expectations regarding appropriate evidence to demonstrate compliance were communicated to the responsible personnel. Additional mitigating actions have included updates and tighter controls around the entity maintenance tracking software, as well as, shifting responsibility for self-certification sign-off to a person more closely aligned with the assets involved (station superintendent or maintenance manager).

Documentation Suggestions:

A number of alleged violations are a result of insufficient documentation issues. SERC staff has compiled a list of suggestions to assist entities in strengthening Standards documentation.

- Since the burden of proof to show compliance is with the entity being audited, each entity should be ready to show the specific portion of each document that demonstrates their compliance with a Standard. At a minimum, the entity should know and be able to point to these specific sections.
 - As a best-practices technique, consider highlighting the specific words or sections in either a .DOC or .PDF version.
- Entities often provide SERC with documents containing creation and review dates close to the dates of the audits. Compliance auditors will also request previous versions of documentation to verify compliance from the date the standard became enforceable or from the previous audit.
- Incorporate revision numbers and tracking to your documents.
- Consider annual reviews of documents and procedures.