General Entity Information

Inherent Risk Assessment and Compliance Oversight Planning

Texas RE collects a variety of data to assess an entity’s risk. For data that are not available to the Risk Group from other sources, Texas RE may request it in the form of a questionnaire during the IRA process, including but not limited to the information below.

Compliance History

Identify all Violations, Areas of Concern, and Recommendations for the entity.

For violations, identify the year, type of monitoring in which the violation was identified, the violation data, the root cause, whether the violation has been mitigated, and whether it is a repeat violation.

For AOCs and Recommendations, provide details along with the year and monitoring activity in which they were identified.

Coordinated Functional Registrations (CFRs)/Joint Registration Organizations (JROs)

Identify any CFRs or JROs to which the entity is party.

Control Facilities

List and describe the entity’s generation and transmission monitoring/control facilities, including the location and overall functionality of any local, remote, and backup facilities as applicable. Describe these facilities’ capabilities for monitoring and/or controlling generation/transmission both inside and outside the ERCOT Interconnection as applicable. Include a description of these facilities’ SCADA/EMS capabilities, voice and data communications, and staffing, as well as whether the facilities are staffed 24/7.

Event Analysis

Has the entity been involved in any of the following events in the previous 5 years?

- Cyber Events
- Physical Events
- Operational Events
General Entity Information

Distribution Information

- Entity’s Peak Load (MW)
- Entity owns:
  - UFLS Equipment
  - UVLS Equipment
- Entity operates:
  - UFLS Equipment
  - UVLS Equipment

Generation Information

- Entity owns:
  - Total Nameplate Rating
  - Individual Unit Nameplate Ratings
  - Individual Unit Fuel Type
  - Reliability Must Run units (RMR)
- Entity operates:
  - Total Nameplate Rating
  - Individual Unit Nameplate Ratings
  - Individual Unit Fuel Type
  - Reliability Must Run units (RMR)

Transmission Information

- Entity owns:
  - Miles of 69 kV* ______________________
  - Miles of 138 kV ______________________
  - Miles of 345 kV ______________________
- Entity operates:
  - Miles of 69 kV* ______________________
  - Miles of 138 kV ______________________
  - Miles of 345 kV ______________________

*Although 69 kV is below the defined 100 kV for BES transmission, ownership of 69 kV could shed additional light on the entity’s risk.
Mapping/Interconnections with Other Entities

- Reliability Coordinator
- Balancing Authority
- Planning Coordinator/Planning Authority
- Transmission Operator
  - Affected Transmission Operators (neighboring/adjacent)
- Transmission Owner
- Transmission Planner
- Generator Operator
- Generator Owner
- Qualified Scheduling Entity
- Distribution Provider (includes UFLS-only DPs)

Performance Data

- ERCOT Mitigation
  - Is the entity a part of any of the following:
    - Mitigation Plans (MPs)?
    - Remedial Action Plans (RAPs)?
    - Pre-Contingency Action Plans (PCAPs)?
    - Temporary Outage Action Plans (TOAPs)?

- Transmission Availability Data System (TADS)
  - Element Total Automatic Frequency (TOF)
    - TOF should have the numbers for the previous 5 years for the entity's transmission as well as the ERCOT wide numbers.

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  - Element Sustained Outage Frequency (SOF)
    - SOF should have the numbers for the previous 5 years for the entity's transmission as well as the ERCOT wide numbers.

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• Generation Availability Data System (GADS)
  o Equivalent Forced Outage Rate Demand (EFORd)
    ▪ EFORd should include the values for the previous 5 years for each unit the entity owns and/or operates.

• Misoperations
  o Has the entity reported any misoperations over the previous 3 years?

• Technical Feasibility Exceptions (TFEs)
  o Has the entity submitted any TFEs?

Standard-Specific Questions for Compliance Oversight Planning

BAL-001-TRE-1

• Has the entity experienced any Frequency Measureable Events (FMEs)?

PER-005-2

• State whether the entity is an applicable Transmission Owner or Generator Operator subject to PER-005-2 as described in Section 4.1.4.1 or 4.1.5.1 of the standard.

PRC-002-2

• Has the entity reported any PRC-002-2 Corrective Action Plans?

PRC-005-6

• Does the entity utilize time-based, performance-based, or a combination of both for its Protection System Maintenance Program (PSMP)?

PRC-023-4

• Does the entity have any circuits applicable to PRC-023-4?

Workforce Capability

• State the percentage of the entity’s operations personnel who have at least 5 years of electric system operations experience. Include operations personnel at applicable control facilities and backup control facilities, whether inside or outside the ERCOT Interconnection, as well as local operations personnel located at the facilities.
Compliance Program and Culture

- Provide documentation of the entity's internal compliance program and state whether the entity regularly reviews and modifies its program as needed.

- State whether all entity employees have access to the internal compliance program. Explain whether the internal compliance program includes employee compensation tied to identifying compliance issues.

- Provide an organizational chart with an accompanying explanation indicating the level of supervision of the reliability compliance manager, officer, or similar position. Indicate if the entity's compliance program is centralized or organized by separate business units.

- State whether the internal compliance program includes appropriate and sufficient training for all relevant staff.

- Describe how the entity utilizes NERC Alerts and Lessons Learned and from NERC and Regional Entities.

- Explain whether the entity’s internal compliance program encourages self-identifying compliance issues and promotes self-reporting to the Regional Entity.

- List any external consultants the entity uses to support its compliance program.

- Describe any overall process the entity uses to create and implement internal controls to mitigate reliability and compliance risks.