Antitrust Admonition

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Notice of this meeting was posted on the Texas RE website and the open portion of this meeting is being held in public. Participants should keep in mind that the listening audience may include members of the press, representatives from various governmental authorities, and industry stakeholders.

Reliability 201: O&P

Upcoming Sessions

June 3 – History and Introduction to Texas RE

June 4 – Registration & Certification

June 5 – Intro to Align

June 6 – Risk-Based Approach to Reliability

June 10 – Foundations of CIP Programs

June 11 – Foundations of O&P Programs

June 12 – Navigating Noncompliance Resolutions

June 13 – NERC Data Collection, Events Analysis, and Guidelines

June 17 – Reliability 201: CIP

June 18 – Reliability 201: O&P

June 24 – Reliability 201: CMEP Feedback Loop

June 25 – Reliability 201: Compliance in Align Walkthrough

June 25 – Reliability 201: Reliability Services

JUNE 2024

SUN	MON	TUE	WED	THU	FRI	SAT
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2	3	4	5	6	7	8
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16	17	18	19	20	21	22
23	24	25	26	27	28	29
30						

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Upcoming ERO Enterprise Events

May - July, 2024

GADS Wind & Solar Template and Application Training

June 27, 2024

Regional Summer Assessment Webinar

July 16-18, 2024

Power Systems Security Conference

July 16-18, 2024

Physical Security Workshop

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Joining as a participant?

Enter event code

Join an existing event

Slido Question #1
How many years of NERC compliance experience do you have?

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RELIABILITY 101 & 201

Building on the Foundation

Strategy

Obligations

- Rules of Procedure
- Applicable Requirements

- Resources (internal or external)
- Evidence
- Internal controls

Implementation

- Processes
- Capabilities
- Training
- Initial performance
- Ongoing compliance
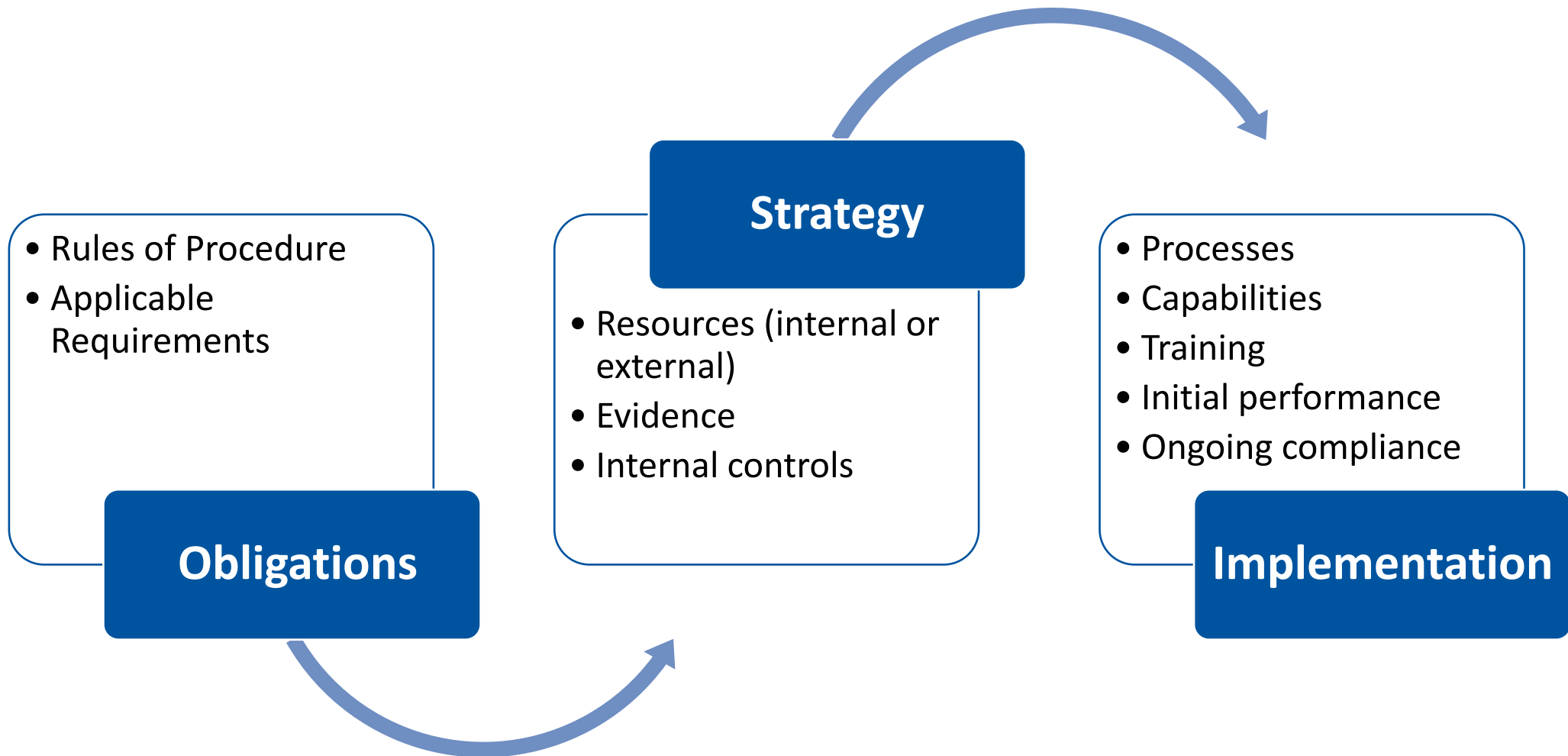
Obligations

Rules of Procedure (ROP) Identify a Registered Entity's Obligations within the Regulator Framework of the ERO Enterprise

- Monitoring methods—types and general process
- Provision of evidence
- Disposition of findings

Numerous Resources to Identify Applicable Reliability Standards and Requirements

- NERC "US Effective Date Status/Functional Applicability" spreadsheet
  - https://www.nerc.com/pa/Stand/Pages/default.aspx
- Texas RE provides information as part of Registration process

Compliance Oversight Plan (COP)—Guidance to Consider

Implementation Plan (IP)—Guidance to Consider

Ongoing Compliance

After the foundation of an O&P Compliance Program has been established, internal controls are essential to ensure ongoing compliance with Reliability Standards.

- Alarms and notifications
- Change management
- Internal review
- Inventory tracking
- Onboarding
- Processes and procedures
- Periodic verification
- Training

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Review Strategy

Assign subject matter experts to perform internal audits for specific Reliability Standards and Requirements (make a plan!)

- Review Implementation Plan Focus Areas every year
- Review Compliance Oversight Plan
- Review internal risk assessment
- Review Reports—Reliability Issues Sub-Committee, State of Reliability reports, Event Reports

Identify prescribed tasks where internal resources are insufficient and third-party contractors may be required

- Find out who does what best (NSRF, CIPWG, vendor fairs, etc.)
- Texas RE does not endorse any one group

Determine sufficiency and completeness of retained evidence

- Using templates (e.g., CIP ERT, PRC-005, etc)?
- Are evidence files up to date for risks identified?
- Are evidence files easily retrievable?
- Any new or updated processes need reviewed?
- Any new roles/staff?
- Does the evidence pass your internal audit process?
- Any new Standards/Requirements that affect training, documentation, evidence, etc. ?

Review resources

- NSRF presentations and CIPWG presentations
- Compliance Guidance--Implementation Guidance, Practice Guides
- Compliance Oversight Plan
- Workshops/Talks with Texas RE/Texas RE*view*
- Texas RE MRC and Board presentations

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Slido Question

Which O&P Reliability Standards are emphasized in your organization's internal training program?

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Intro to the Standards

PRC-005-6

Protection System, Automatic Reclosing, and Sudden Pressure Relaying Maintenance
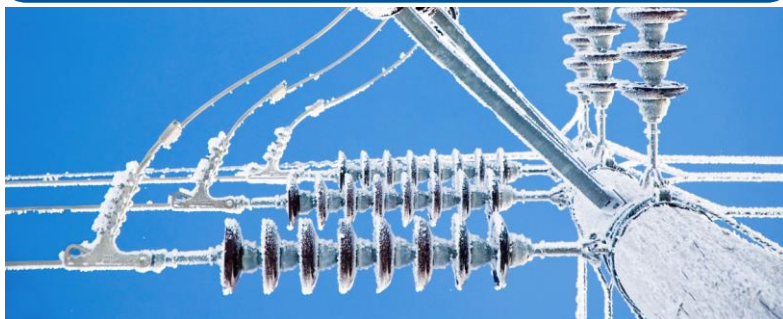
EOP-011-2

Emergency Preparedness and Operations

FAC-008-5

Facility Ratings

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Slido Question

What are some of the challenges that you are facing with PRC-005?
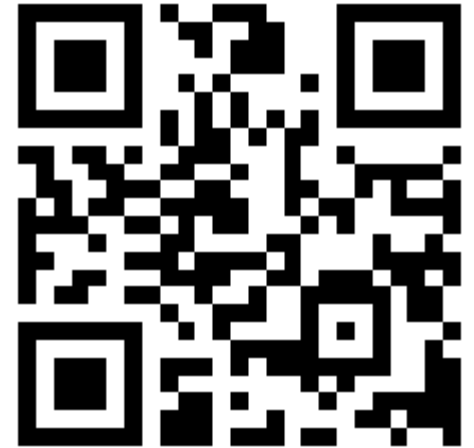
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PRC-005-6 R3

- Commission Protection Systems to establish initial performance dates

  - Process/notification/documentation

- Maintenance of Protection Systems to maintain reliability

  - Process/notification/documentation

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PRC-005-6 R3 Strategy/Implementation

Personnel Assigned and Trained

Planned Internal Audit

Not Internal Risk Assessment (Why?)

Checklists

Peer Reviews

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PRC-005-6 R3 Strategy/Implementation

Determine Sufficiency and Completeness of Process/Retained Evidence (Determine Periodicity)

- Using most recent PRC-005 template/process
- Evidence files up to date and easily retrievable for risks identified
- New or updated processes/templates/software have been reviewed and staff is trained
- New roles and staff aware of expectations, location of documentation, timing, peer review, etc.
- Periodic review of evidence passed internal audit process
- No new Standards/Requirements that affected training, documentation, evidence are in play
- For new/updated Protection Systems, other Standards were considered and updates applied as needed (PRC-027, FAC-008, PRC-004, PRC-006, PRC-012, PRC-023, PRC-024, PRC-025, CIP-002, etc.)?

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Slido Question

What are some of the challenges that you are facing with EOP-011-2?

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EOP-011-2 R1

- Periodic review of Operating Plan(s)

  - Lessons Learns

- Ensure that updated Operating Plan(s) are reviewed by the Reliability Coordinator prior to implementing

EOP-011-2 R1 Plan Strategy/Implementation

Train on Updates to the Operation Plan(s)

Conduct "Lessons Learned" Discussion(s) Post-Event(s)

Clear Roles and Responsibilities

Reliability 201: O&P

EOP-011-2 R7

- Periodic review of cold weather preparedness plan(s)
  - Lessons learned
- Annual inspection and maintenance generating unit(s) freeze protection measures
  - Process/notification/documentation

EOP-011-2 R7 Plan Strategy/Implementation

Periodically Review the Plan(s) and Data

Conduct "Lessons Learned" Discussion Post-Cold Weather Season

Clear Roles and Responsibilities

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Perform Annual Inspection Prior to Cold Season

Peer Review of Maintenance and Inspections

Checklists

Review of Third-Party Work

Walk Downs

Think **Forward**

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EOP-011-2 R8

- Process to periodic review maintenance and operations personnel to be trained
  - Document changes and save them as evidence
- Onboarding training
- Documentation tracking training easily available

Train Annually

Make Training Pursuant to Requirement R7

Follow a Framework to Design and Develop the Training
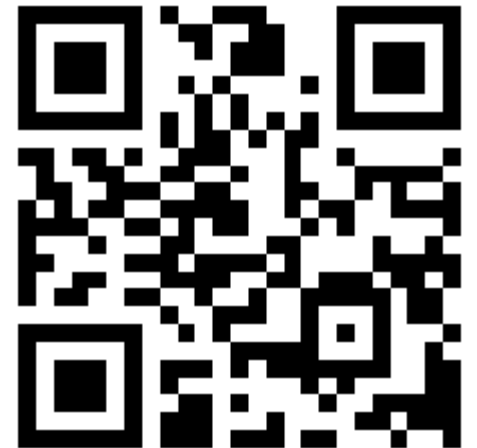
Think **Forward**

Reliability 201: O&P

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Slido Question

What are some challenges that you are facing with FAC-008?

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FAC-008-5 R6 Implementation

FAC-008-5 R6

- Clearly identify the specific underlying assumptions, design criteria and methods used to determine the Equipment Ratings
- Develop process to periodically review the Facility Rating Methodology, Facility Rating Workbook, and documentation
  - New Facility commissioning
- Have related evidence easily available
- Have clear delineation of responsibilities

FAC-008-5 R6 Strategy/Implementation

Facility Walk Downs

Periodic Review of the Facility Workbook

Documented Process to Communicate Facility Rating Changes

Revision History

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Slido Question

Which recent Texas RE*view* article on the 2024 risk elements did you find to be the most interesting?

Reliability 201: O&P

Resources

All

- All internal groups updated routinely
- NSRF peer review and presentations (CIPWG presentations as well) have been completed
- Compliance Guidance—Implementation Guidance, Practice Guides
- Workshops/Talks with TexasRE/Texas RE*view* all reviewed for applicable content regarding risk

PRC-005-6

- Supplementary Reference and FAQ 2015
- PRC-005 Spreadsheet

EOP-011-2 and EOP-012-2

- SGAS-Cold Weather Preparedness FAQ (March 2023)
- Cold Weather Preparedness Small Group Advisory Session General Presentation 2023
- Cold Weather Preparedness Small Group Advisory Session General Presentation 2023 Recording
- Cold Weather Preparedness Small Group Advisory Session General Presentation 2024

FAC-008-5

- ERO Enterprise Themes and Best Practices for Sustaining Accurate Facility Ratings

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Questions?