



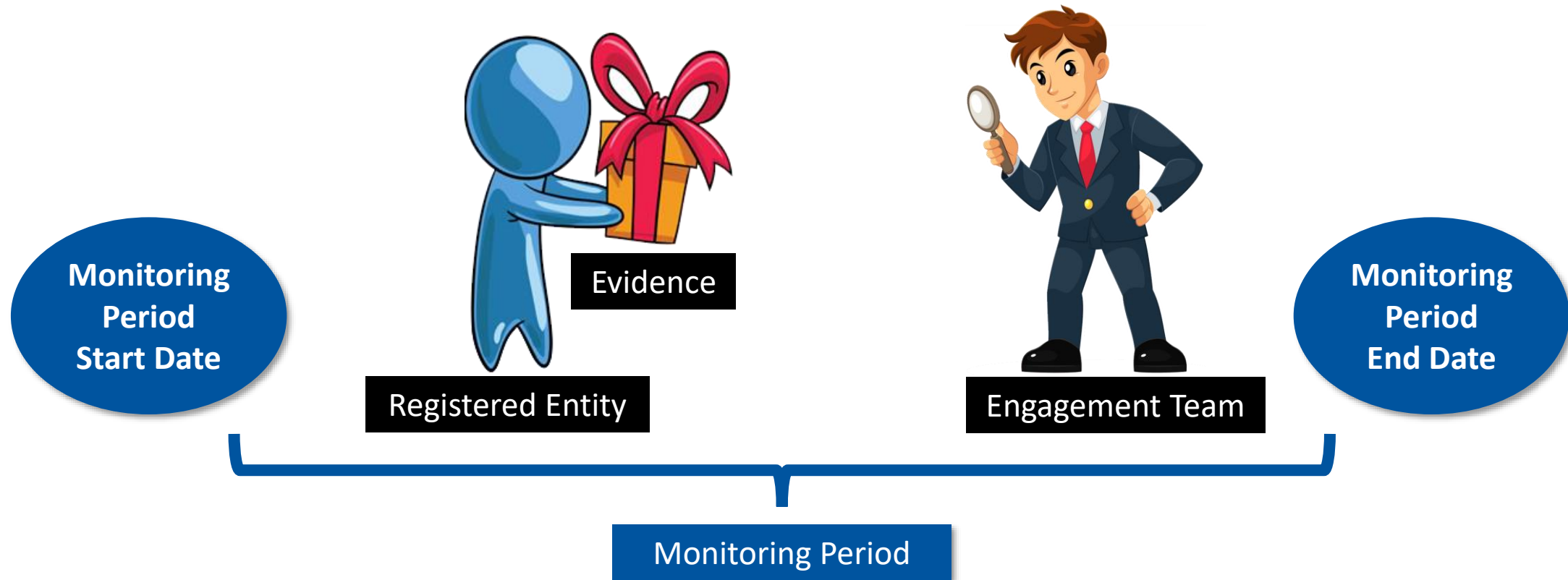
TEXAS RE

The Importance of Evidence Dating

**Eric Newnam
Compliance Engineer, Sr.**

April 25, 2024

Monitoring Period



Self-Certification Monitoring Period in Align

Self-Certifications										Align For Entities
Active Self-Cert Requests Self-Cert Submittals Completed Self-Certs Self-Cert RFEs										NCR9999999 TX Editor 1
MY ACTIVE SELF-CERTS										
	UNIQUE ID	REGISTRATION	SELF-CERT NAME	STANDARD AND REQUIREMENT	MONITORING PERIOD	DUE DATE	PROGRESS	CREATED BY	MODIFIED BY	MODIFIED ON
<input type="checkbox"/>	SC2023-000022	NCR9999999 - TXRE - Training Energy Corp. TXRE in TXRE	Question test 09.29.2023	CIP-003-8 R1.	08/29/2023 - 09/29/2023	29 Oct 2023 -155 days to complete	NOT STARTED	ImportUser	Import User	09/29/2023
<input type="checkbox"/>	SC2023-000020	NCR9999999 - TXRE - Training Energy Corp. TXRE in TXRE	question test	CIP-003-8 R2.	03/01/2021 - 08/04/2021	30 Sep 2021 -914 days to complete	NOT STARTED	ImportUser	Import User	09/29/2023
<input type="checkbox"/>	SC2023-000020	NCR9999999 - TXRE - Training Energy Corp. TXRE in TXRE	Demo Library Questions vs	CIP-003-8 R2., CIP-003-8 R4., FAC-	01/01/2023 -	31 Jan 2024	NOT STARTED	ImportUser	Import User	09/29/2023

SC2023-000020

General

Self-Cert ID SC2023-000020

Registration NCR9999999 - TXRE - Training Energy Corp. TXRE in TXRE **Region/LRE** TXRE **Requested by CEA** TXRE

Self-Cert Name question test **Compliance Year** 2021

Instructions

Submit on or after August 4, 2021 **Monitoring Period Start** March 1, 2021

But no later than September 30, 2021 **Monitoring Period End** August 4, 2021



Audit and Spot Check Monitoring Period in Align

ME22-00044

General Working Papers ANP Report

General

Engagement Scope CIP-003-8 R2.; CIP-003-8 R1.; PRC-012-2 R7.; PRC-012-2 R6.; CIP-003-8 R4.; PRC-012-2 R8.; CIP-003-8 R3.; PRC-012-2 R5.; PRC-012-2 R1.; PRC-012-2 R3.

Start Date May 23, 2022

End Date June 3, 2022

Monitoring Period Start Date January 24, 2021

Monitoring Period End Date January 24, 2022

Post Audit Survey Link

ME22-00044

General Working Papers ANP Report

General

ANP Visibility Date January 24, 2022 ANP Deadline Date January 24, 2022

Additional Notes/Instructions

ANP Documents

[Audit Notification Letter](#)

ANL Info

Registered Entity NCR9999999 - TXRE - Training Energy Corp. TXRE in TXRE

Compliance Audit Type Both

Start Date May 23, 2022

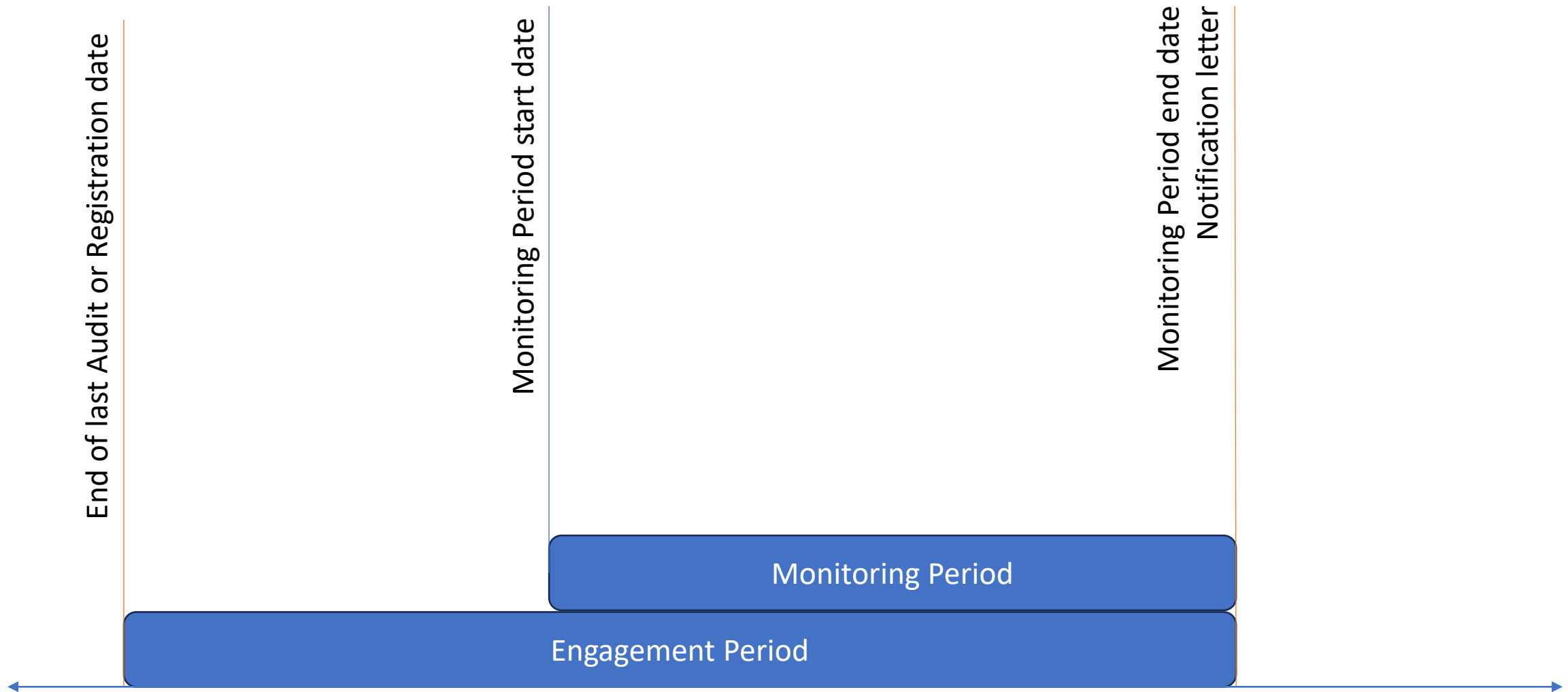
End Date June 3, 2022

Monitoring Period Start Date January 24, 2021

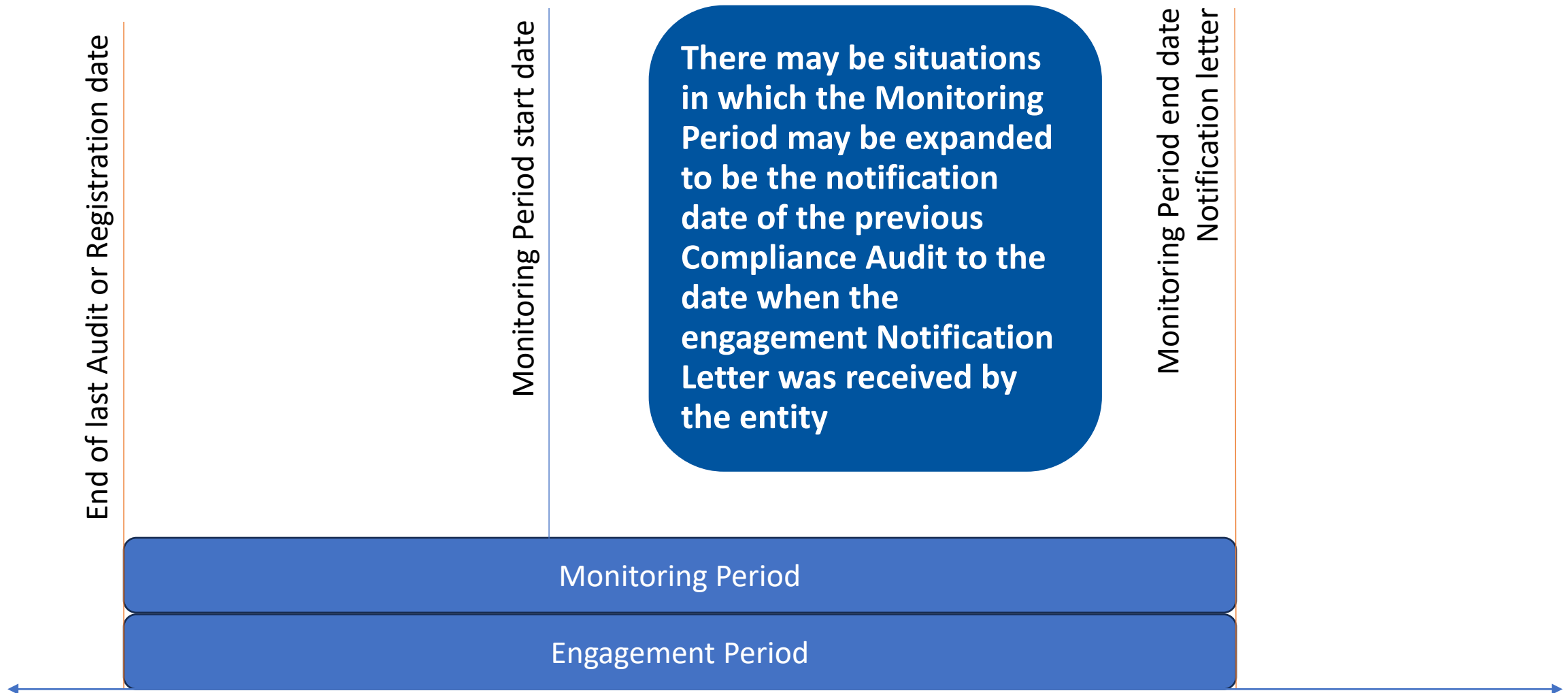
Monitoring Period End Date January 24, 2022

Compliance Scope

Monitoring Period Timeline



Monitoring Period Timeline



EOP-011-2 R7

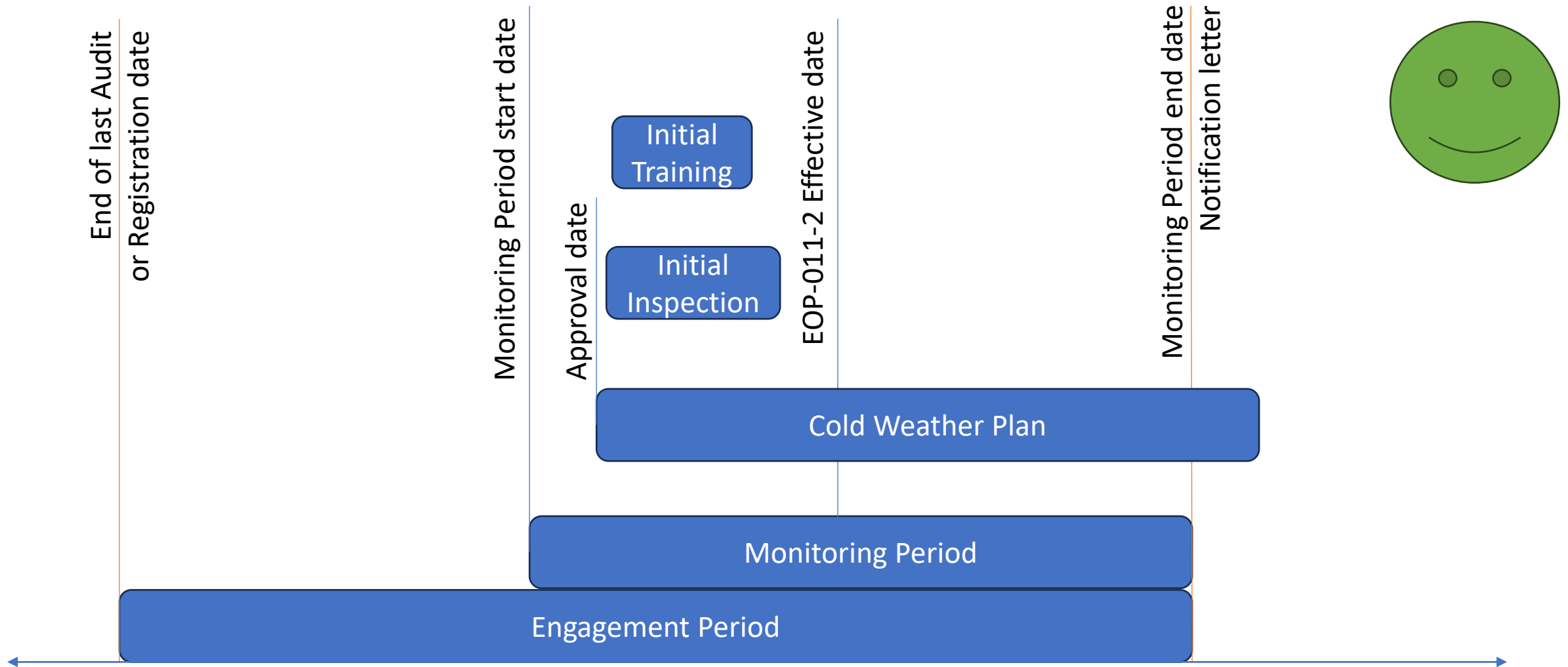
Recently, Texas RE has engaged entities with EOP-011-2 R7, and we have requested evidence of their annual inspection and maintenance of generating unit(s) freeze protection measures

If there are multiple pieces of evidence that show that the inspection and maintenance activities took place, provide them all

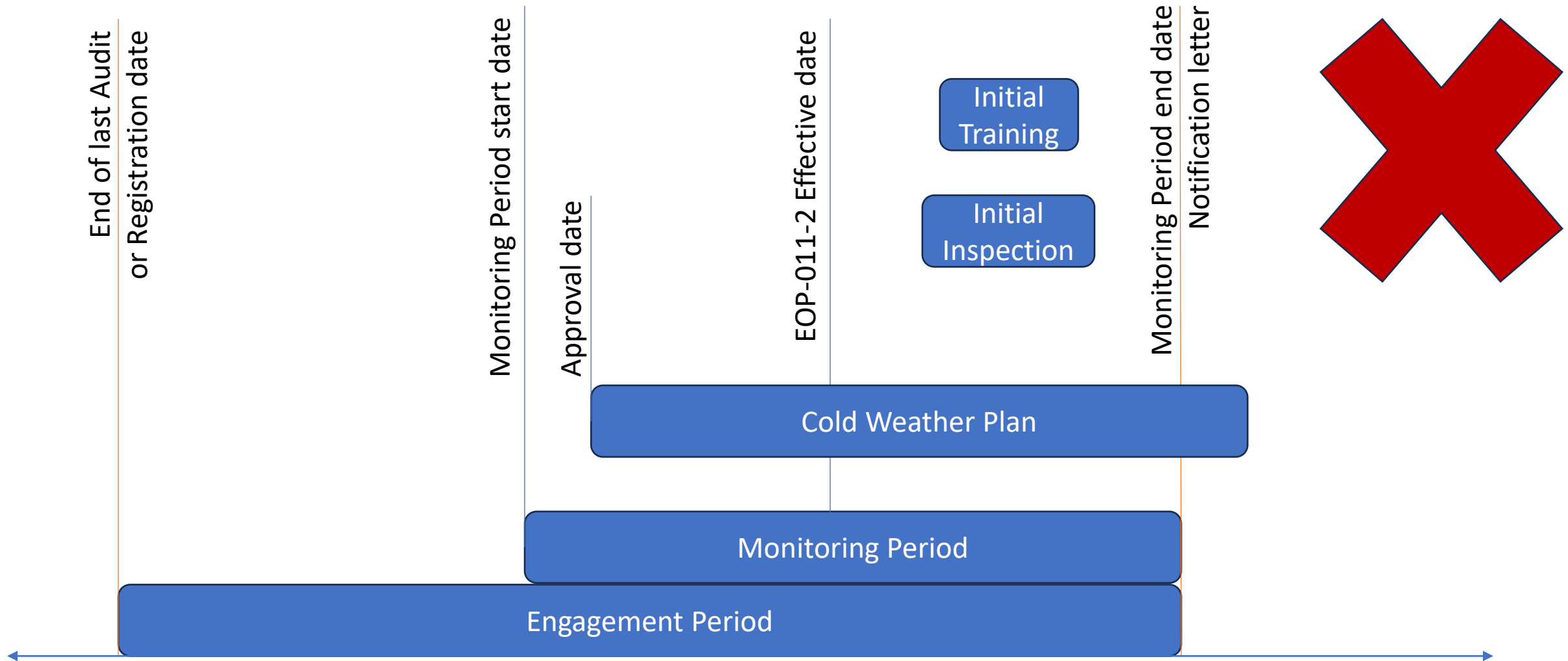
When registered entities provide inspection or maintenance reports without dates, it has required us to ask for additional pieces of information (included but not limited to work orders, checklists, etc.) to determine if those activities took place during the monitoring period



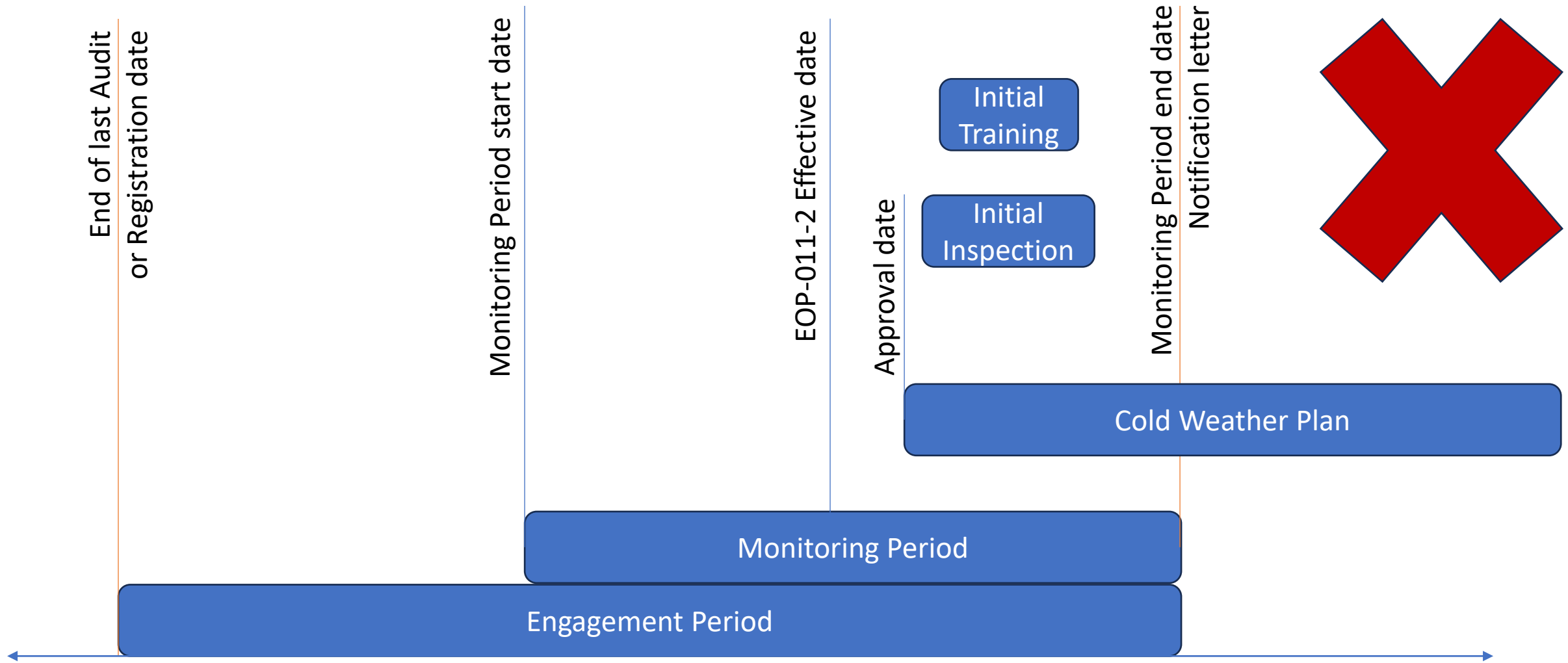
Cold Weather Plans



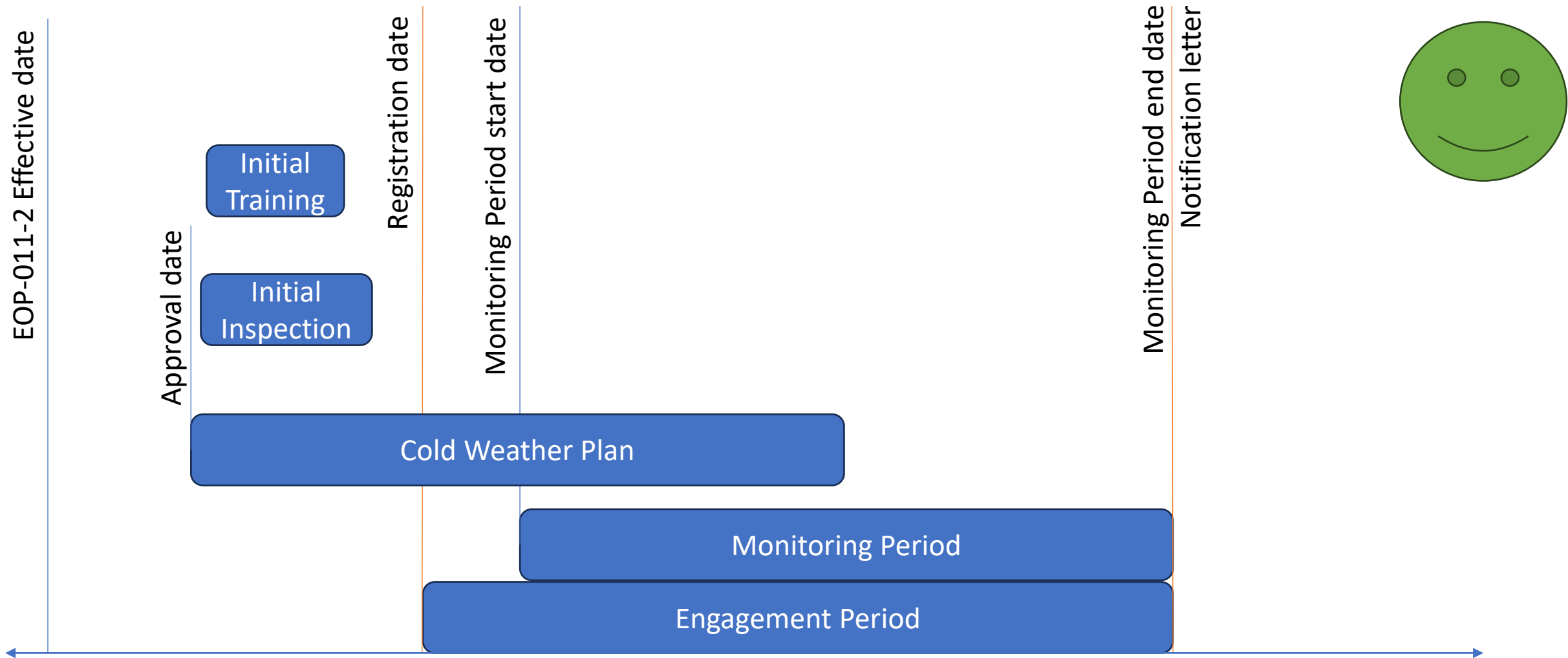
Cold Weather Plans



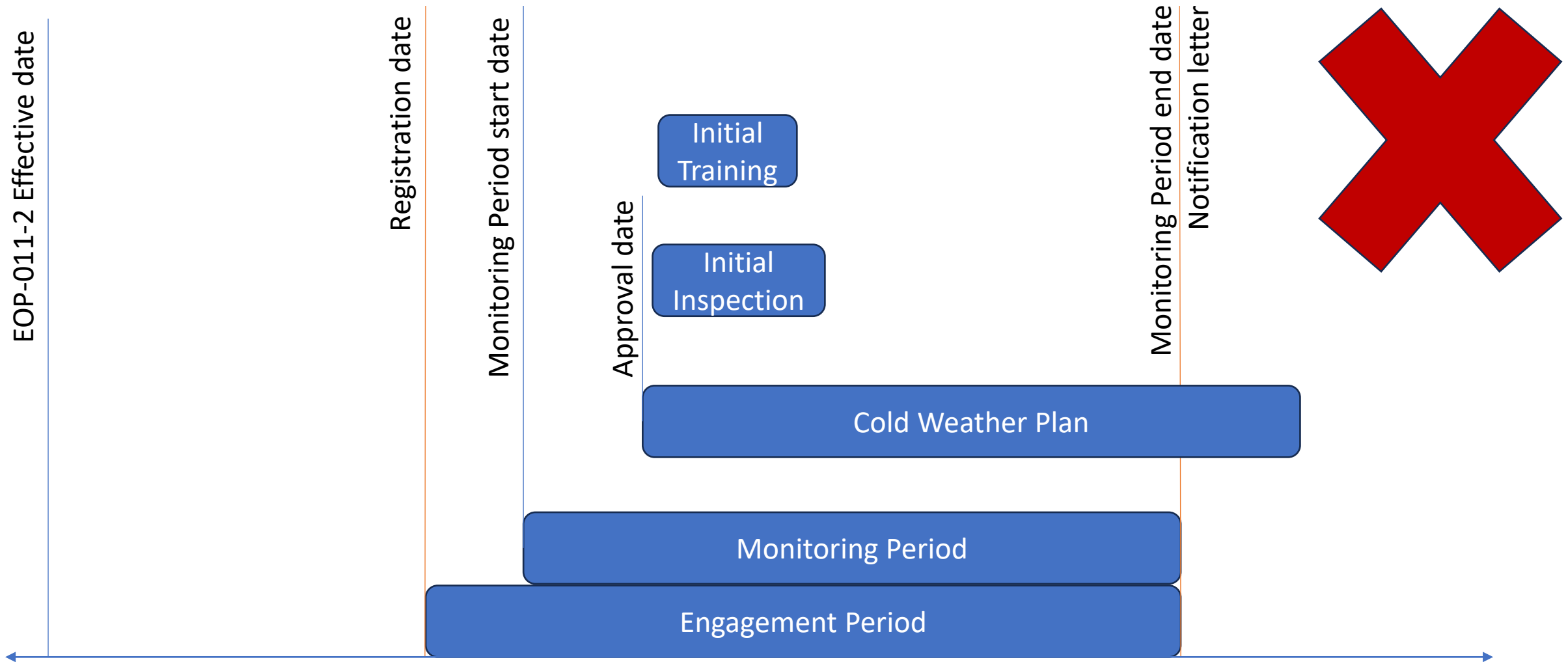
Cold Weather Plans



Cold Weather Plans



Cold Weather Plans



FAC-008-5 R6

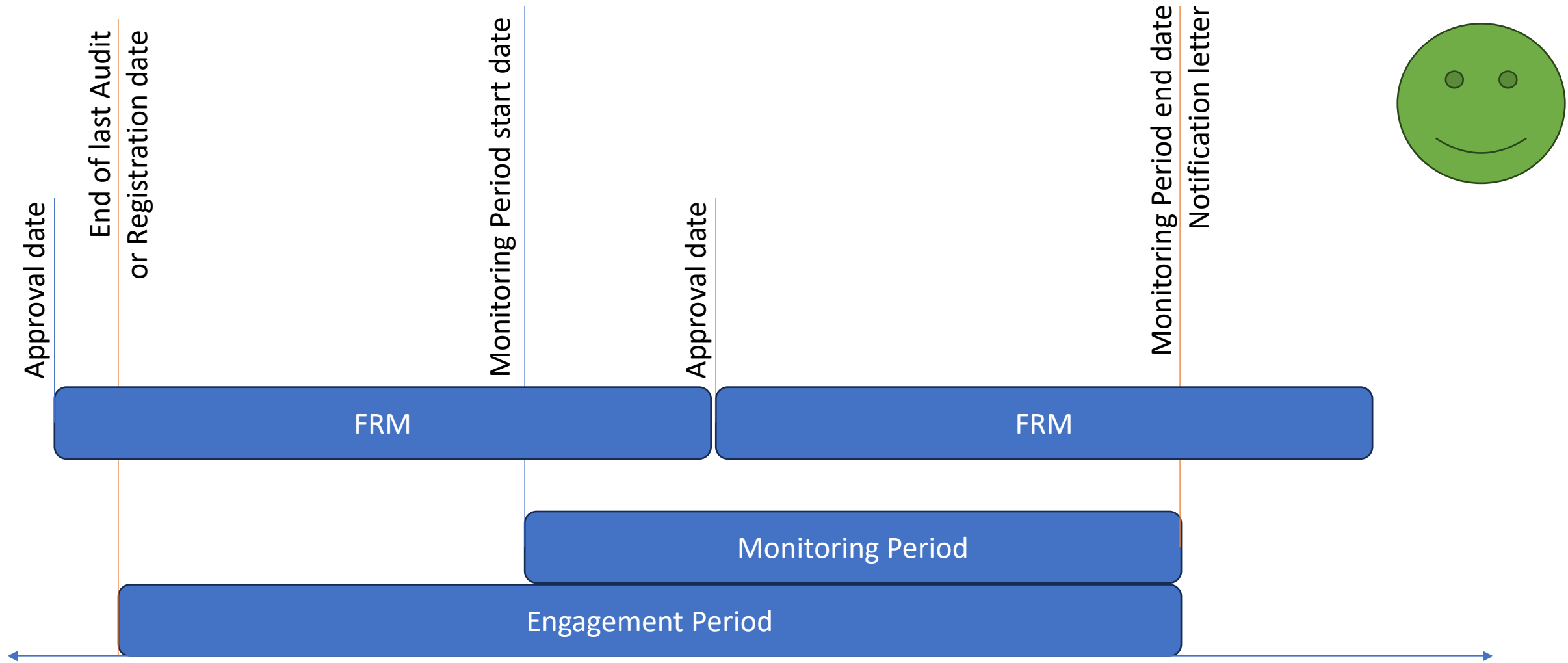
FAC-008-5 R6 has been in scope for multiple engagements the past couple of years

Facility Ratings should be developed in a timely manner to protect the Equipment that comprises the Facility and therefore protecting the reliability of the BPS

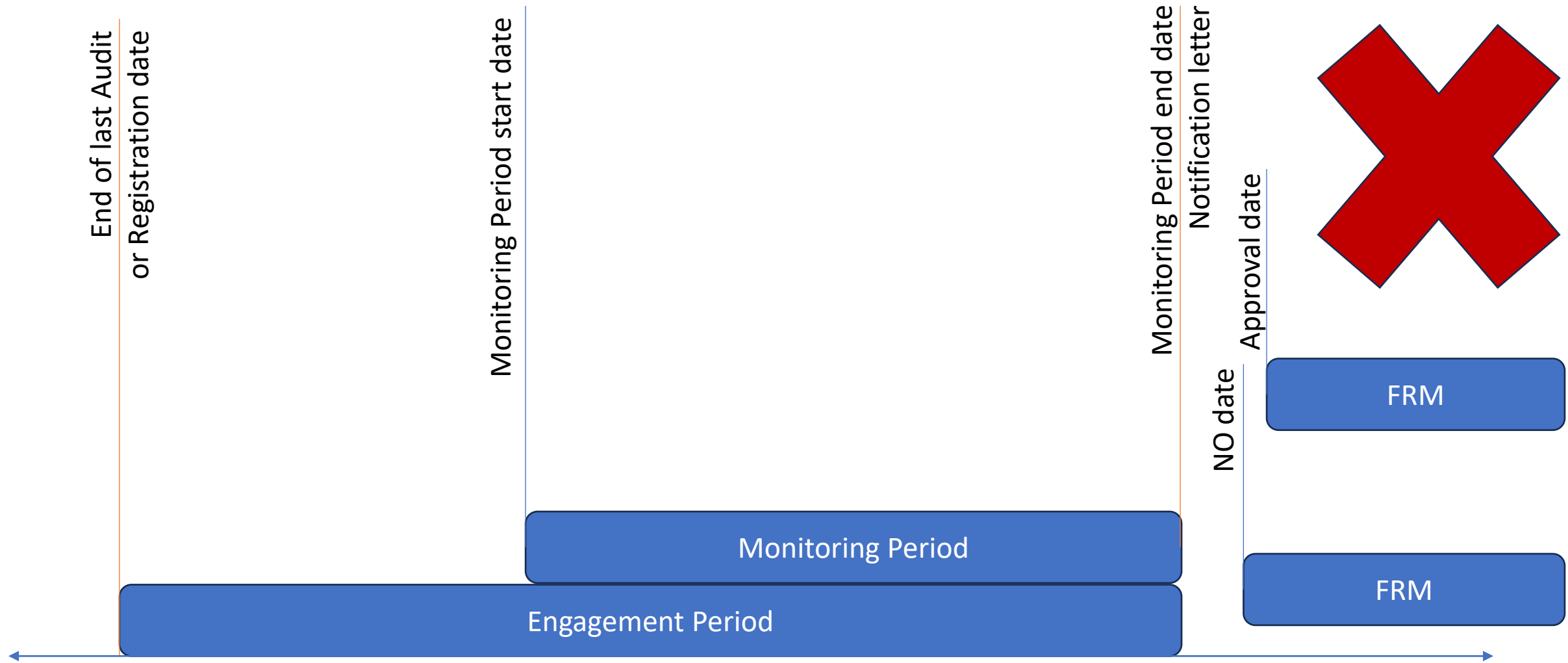
There have been opportunities where one or more pieces of requested evidence do not have a date of approval and it is not clear when the Facility Ratings were developed

If there are multiple pieces of evidence that show that combined, account for the entire monitoring period, provide them all





Dating



The Importance of Being Dated

Ensuring documentation is dated and/or contains revision history helps registered entities by ensuring key personnel are utilizing the most up-to-date information and completing key tasks on time. This increases the likelihood of the entity being in compliance, which reduces risks to the reliability and security of the BPS.



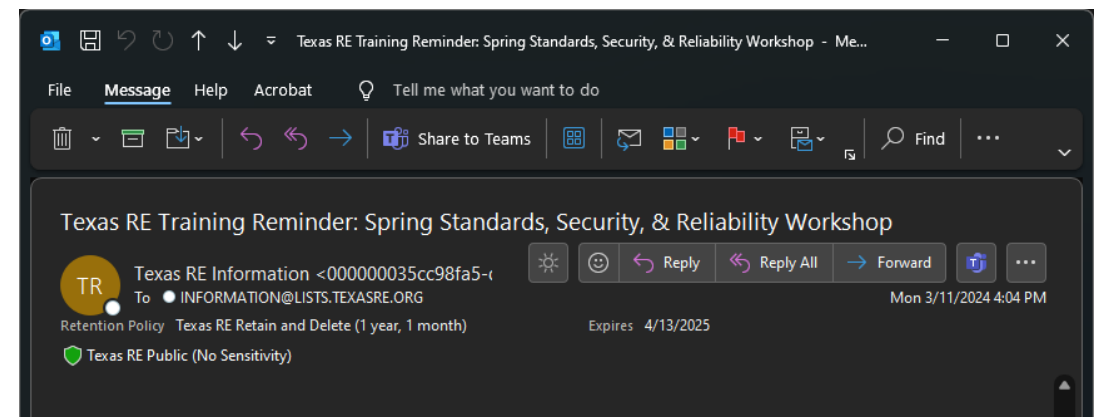
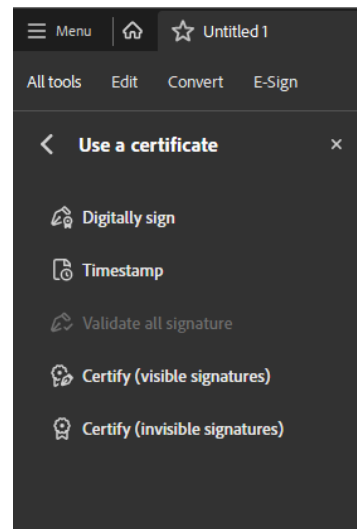
Great Ways to Record Dates

Properties of Well-Recorded Dates

- ❑ Clearly recorded date (full date with description)
- ❑ Systematically recorded (e.g. email, electronic signatures)
- ❑ Not easy to accidentally change (e.g. adobe certificate, scanned date)

Version History

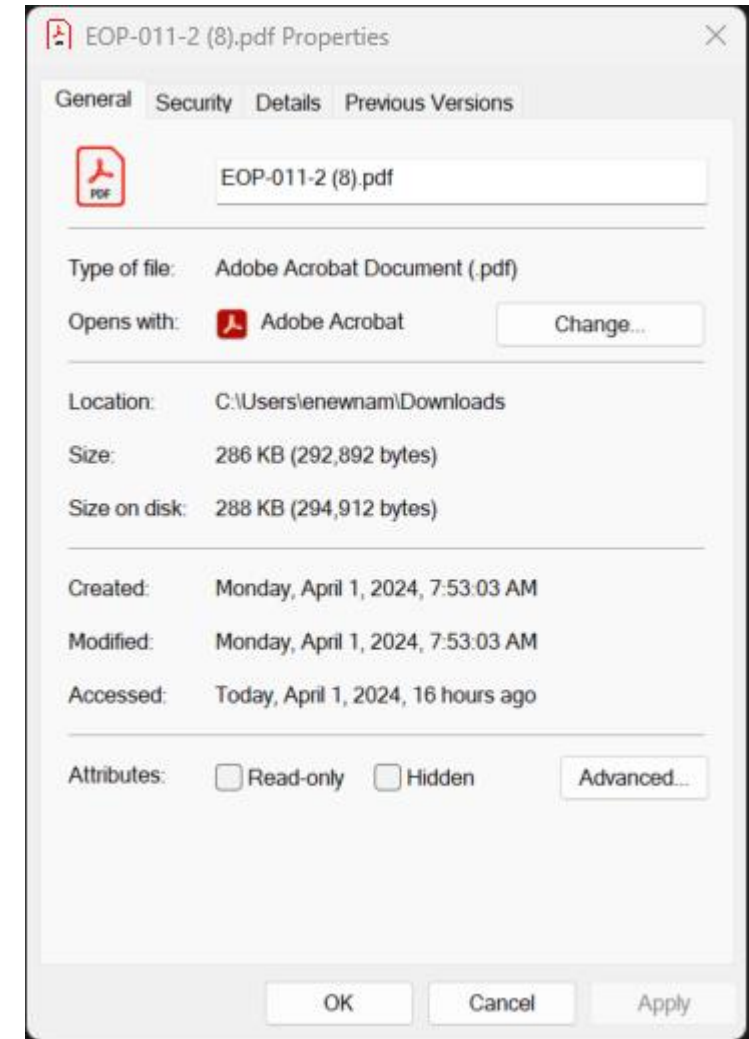
Version	Date	Action	Change Tracking
1	November 13, 2014	Adopted by Board of Trustees	Merged EOP-001-2.1b, EOP-002-3.1 and EOP-003-2.
1	November 19, 2015	FERC approved EOP-011-1. Docket Nos. RM15-7-000, RM15-12-000, and RM15-13-000. Order No. 818	
2	June 11, 2021	Adopted by the Board of Trustees	Revised under Project 2019-06
2	August 24, 2021	FERC approved EOP-011-2. Docket Number RD21-5-000	
2	August 24, 2021	April 1, 2023	Effective Date



Not So Great Ways to Record Dates

Properties of Poorly Recorded Dates

- ☐ Vague (multiple contradicting dates with no description)
- ☐ Easy to accidentally change (file names, unprotected Excel cell)
- ☐ META data, file properties (does not carry over when submitted)



<input type="checkbox"/> Name	Date modified
▼ Today	
<input type="checkbox"/> VAR-002-4.1 (3).pdf	4/1/2024 2:03 PM
<input type="checkbox"/> ROP_Appendix 4C_20220519 (1).pdf	4/1/2024 10:07 AM
<input type="checkbox"/> EOP-011-2 (8).pdf	4/1/2024 7:53 AM



The background of the slide features a blurred image of the Texas state flag on the left and a close-up of a wind turbine's hub and blades on the right. The blades are white with red tips. A dark blue rounded rectangle is centered over the image.

Questions?



TEXAS RE

Ensuring electric reliability for Texans