



Compliance Monitoring

Blake Ianni

O&P Compliance Engineer III

Texas Reliability Entity, Inc. (Texas RE) strictly prohibits persons participating in Texas RE activities from using their participation as a forum for engaging in practices or communications that violate antitrust laws. Texas RE has approved antitrust guidelines available on its website. If you believe that antitrust laws have been violated at a Texas RE meeting, or if you have any questions about the antitrust guidelines, please contact the Texas RE General Counsel.

Notice of this meeting was posted on the Texas RE website, and 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.





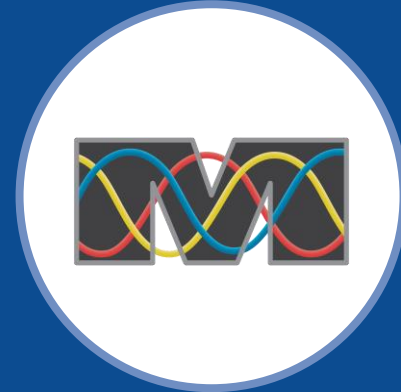
June - July 13, 2023

Inverter-Based
Resource Webinar
Series



June 12, 2023

Technical Talk
with RF



June 29, 2023

Regional Summer
Assessment Webinar



slido

Product

Solut

Slido Question #1

Why does compliance exist?

#TXRE

Joining as a participant?

Join an existing event



Why Are We Here Today?

What Does Society Expect?

Highly Reliable & Secure Bulk Power System





NERC

NORTH AMERICAN ELECTRIC
RELIABILITY CORPORATION



Rules of Procedure

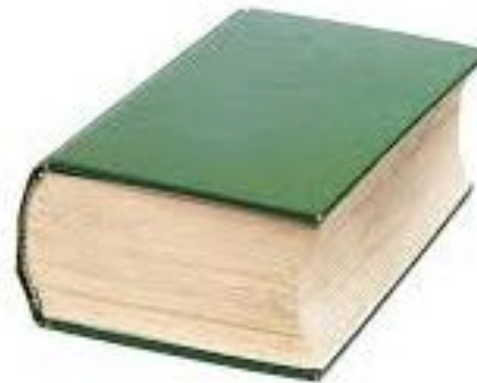
Covers definitions, registration, oversight, sanction guidelines (penalties), & many other things, including the Compliance Program requirements for Regions

2023 ERO Enterprise Compliance Monitoring and Enforcement Implementation Plan

Version 1.0

October 2022

[Implementation Plan Link](#)



And, of course, the Reliability Standards!



Compliance



O&P



Risk
Assessments



CIP



Tools for Assessing Compliance



Compliance Audits

Spot Checks

Self-Certifications

Complaints

Data Submittals

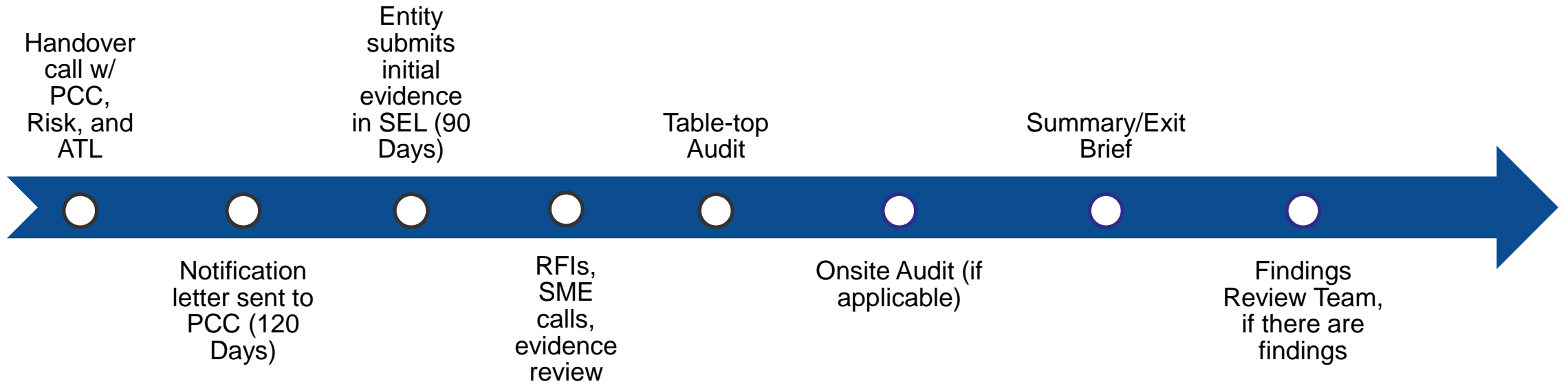
Self-Identification

Compliance Investigations

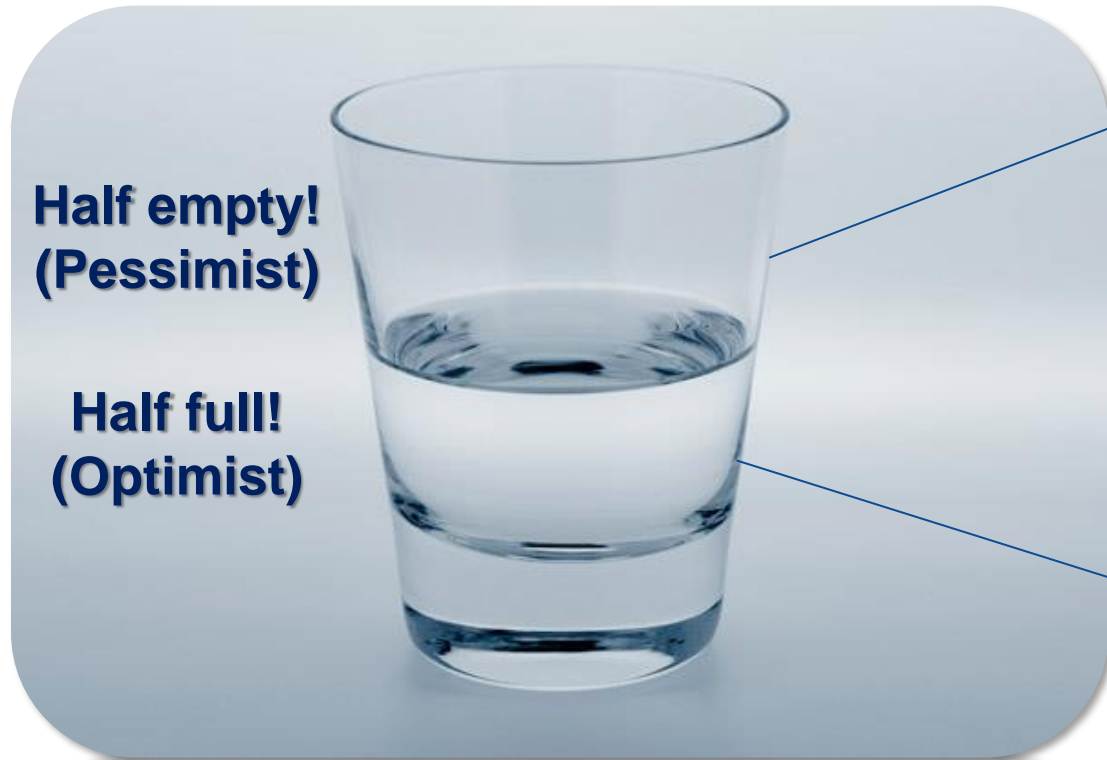
Objective, factual information enables management to make informed decisions (e.g. engagement findings, timing and scoping of future engagements, etc.)



Audit Process Overview



An auditor's questioning, evaluative approach towards evidence:



**Half empty!
(Pessimist)**

**Half full!
(Optimist)**

Engineer

The glass is twice the size it needs to be (or has a safety factor of 2).

Auditor

We must seriously consider that someone without proper rights or authorization misappropriated some of that water...if it *is* water.



Slido Question



Slido: Is this glass...

- A. Half Full**
- B. Half Empty**
- C. Twice the size it needs to be**
- D. Missing water due to potential misappropriation**
- E. How do we know that's water?**



Top Ten Standards-2022



Category	Standard	Number Discovered
Security Management	CIP-003	15
Protection Maintenance	PRC-005	13
Capability Verification	MOD-025	12
Relay Settings	PRC-024	11
Capabilities Coordination	PRC-019	9
Generator Performance	BAL-001-TRE	8
Facility Ratings	FAC-008	8
Modeling Verification	MOD-026	8
Modeling Verification	MOD-027	8
Baselining	CIP-010	7
	Total	99

Discovered between January 1, 2022, and December 31, 2022



Slido Question

What do you think is the main reason that Standards are violated?



- Think Reliability & Security
- Identify Objectives
- Identify Population
- Monitor Performance & Task Completion
- Organize Resources
- Plan Ahead
- Address Any Issues

Documentation + Internal Controls!!!



FAC-008-5 R6

Periodic walkdowns of Facilities to ensure Ratings are up-to-date

- Cross-referencing field information with worksheet(s) and one-lines

Periodic review of the Facility Ratings methodology document for accuracy

- Including underlying assumptions, design criteria, and methods used in determining Equipment Ratings



[Texas RE Staff](#) (call, email, meetings) [Texas RE website](#) ([Welcome Packet](#), [Entity Resources](#), [Resource Hub](#)) [Texas RE Training Page](#) (Presentation Materials, Recordings, etc.)

[NSRF](#)

[CIPWG](#)

[Texas RE Workshops](#)

[Talk with Texas RE](#)

[Texas REview](#)

[Texas RE Board Meetings](#)

[NERC Meetings](#)

Compliance, like safety, is everyone's job, and a culture of compliance takes proactive, on-going effort. Collaboration and communication are encouraged.





Blake Ianni
O&P Compliance Engineer III
Blake.Ianni@texasre.org
512-583-4936



Upcoming Sessions



June 5—Intro to Align

June 6—Standards Development

June 8—Compliance Monitoring

June 13 – CIP 201

June 14 – Foundations of O&P

June 15 – O&P 201

June 20 – Risk-Based Approach to Reliability

June 21 – Improving Self-Reporting 201

June 22 – NERC Data Submission, Events Analysis, and Guidelines

June 27 – Initial Engagement Submissions

June 29 – Reliability Services

JUNE 2023						
Sun	Mon	Tue	Wed	Thu	Fri	Sat
28	29	30	31	1	2	3
4	5	6	7	8	9	10
11	12	13	14	15	16	17
18	19	20	21	22	23	24
25	26	27	28	29	30	1



The background of the slide features a blurred Texas state flag on the left and a target with several darts on the right. The darts are clustered in the center of the target, suggesting a focus on a specific point.

Questions?



TEXAS RE

Ensuring electric reliability for Texans