



**TEXAS RE**  
Ensuring electric reliability for Texans

## **Internal Controls and Resiliency**

**Curtis Crews**  
**Director O&P Compliance and**  
**Risk Assessment**

**EOP-011-2/3 R1 “Each Transmission Operator shall develop, maintain, and implement one or more Reliability Coordinator-reviewed Operating Plan(s) to mitigate operating Emergencies in its Transmission Operator Area. The Operating Plan(s) shall include .....**”

- “1.2.6. Provisions to determine reliability impacts of:
  - 1.2.6.1. cold weather conditions; and
  - 1.2.6.2. extreme weather conditions”

# Definitions

**EOP-011-2 R7—“Each Generator Owner shall implement and maintain one or more cold weather preparedness plan(s) for its generating units. The cold weather preparedness plan(s) shall include the following, at a minimum:”**

**Not good enough! Make a new Standard with new definitions....**

**EOP-012-1 R3—“Each Generator Owner shall implement and maintain one or more cold weather preparedness plan(s) for its generating units. The cold weather preparedness plan(s) shall include the following, at a minimum:”**

# Definitions

**Operating Plan-** A document that identifies a group of activities that may be used to achieve some goal. An Operating Plan may contain Operating Procedures and Operating Processes.

- **Operating Procedure-** A document that identifies specific steps or tasks that should be taken by one or more specific operating positions to achieve specific operating goal(s). The steps in an Operating Procedure should be followed in the order in which they are presented, and should be performed by the position(s) identified.
- **Operating Process-** A document that identifies general steps for achieving a generic operating goal. An Operating Process includes steps with options that may be selected depending upon Real-time conditions

**Cold weather preparedness plan???**

**A plan should state the objective clearly– Think Resiliency!**

# Internal Control Basics for a Plan (Development/Maintenance)

## Management reviews documents for accuracy, clarity, and accessibility

- Consider an extra independent review to test accuracy, clarity, and accessibility

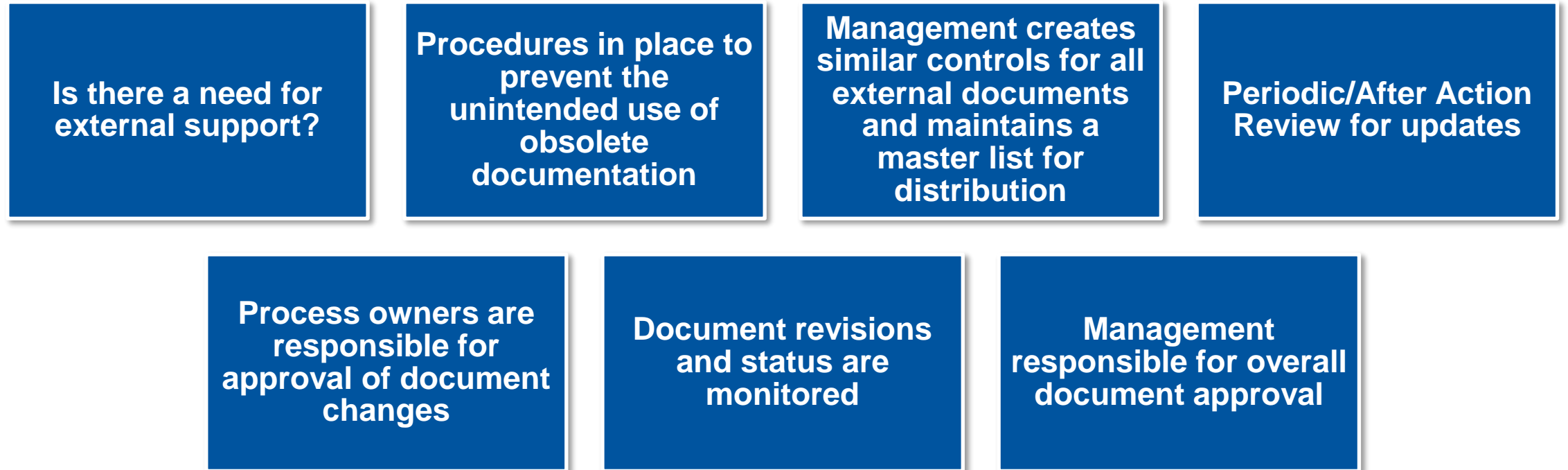
## Roles and responsibilities clearly defined (location/site/event specific as needed)

- Ensure awareness
- Area coverage (where are support personnel staged?)

## Timelines defined (overall and individual steps as applicable)

- Initiation triggers (what is “cold”/”extreme”?)
- Return to normal operations

# Internal Control Basics for a Plan (Development/Maintenance)



# Internal Control Basics for a Plan (Implementation)



Process owners maintain an up-to-date distribution list to ensure every team member has access to the most current version of document(s)



Process for identification of needs (e.g., third-party, supplies, outages)

- Timing (need a third party? an outage?)
- Resources (tools, tool support, people and supplies)

# Internal Control Basics for a Plan (Implementation)

**Checklist for  
Process owners  
to indicate  
status/completion**

**Contact lists  
(internal and  
external)**

**Periodic gap  
analysis/Planned  
reviews**

**Training**



# Implementation keys

**Resiliency—the capacity to recover quickly**

**Roles and responsibilities clearly defined (location/site/event specific as needed)**

- Ensure awareness
- Staff is trained and knows the tools/actions needed

**Periodic checks**

**Implementation timeline for needs**

- Timing (need a third party? an outage? how long does it take to get to issue (physically)?)
- Resources (tools, tool support, people and supplies)

# Keys

Planning provides attention on objectives and results

Actual results may be different than planned results

Planning provides a guide for action/decision making

Can not anticipate everything

Planning improves resource utilization/teamwork

Monitor utilization plans

Planning allows flexibility to adapt

Avoid blindly following the plan if conditions change

**Planning is the key to resiliency!!**