# **TEXAS RE**

#### Best Practices and Internal Controls for EOP-011-2 R8

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March 28, 2024

#### Purpose

To ensure that operations and maintenance personnel are provided the appropriate generating unit-specific training for cold weather preparedness plan(s), to mitigate operating Emergencies in cold weather.

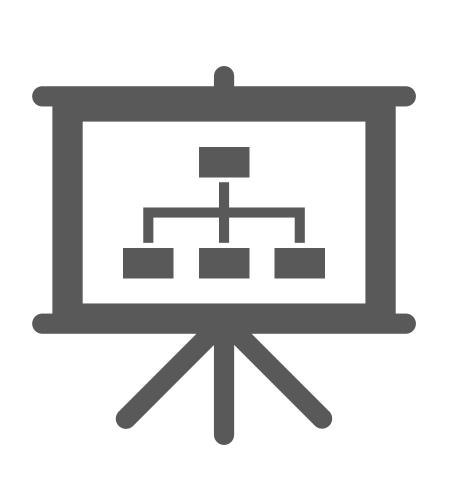
### Applicability

Generator Owners (GOs) in conjunction with its Generator Operators (GOPs)

### Requirement

Applicable entities shall identify the entity responsible for providing the generating unit specific training, and that identified entity shall provide training to its maintenance or operations personnel responsible for implementing cold weather preparedness plan(s) developed pursuant to Requirement R7.

- Identify the roles of the GO and the GOP and address their responsibilities for providing generating unitspecific training.
- Both GOs and GOPs should document the agreement they have with one another, and periodically verify that the roles and responsibilities have not changed.
- Once the entity responsible for providing training has been identified, that entity should determine which operations and maintenance personnel are responsible for implementing the cold weather preparedness plan(s), including third-party contractors.
- ❑ <u>WHY</u>: Defining roles and responsibilities boosts transparency and accountability by clearly outlining what each entity or personnel member must do or complete.









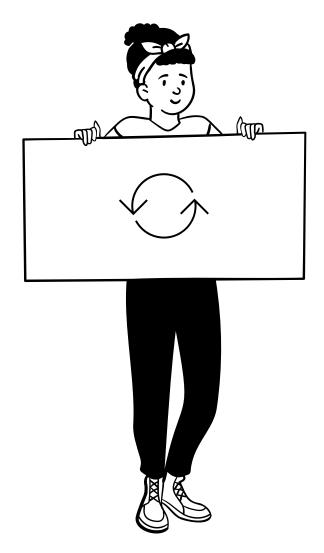
- For new entities, ensure that all operations and maintenance personnel responsible for implementing the cold weather preparedness plan(s) are trained prior to the entity's date of registration.
- ➡ For new operations and maintenance personnel responsible for implementing the cold weather preparedness plan(s), ensure that training is provided within a reasonable time and prior to completing activities related to implementing the cold weather preparedness plan(s).
- WHY: It is crucial to provide training as per the implementation plan, not only for the sake of compliance, but to ensure that the entity is prepared to respond to and mitigate cold weather events or Emergencies.



#### **Change Management**

### Entities should consider implementing internal controls involving the following:

- If the cold weather preparedness plan(s) are revised, ensure that the operations and maintenance personnel responsible for implementing the cold weather preparedness plan(s) are provided updated training within a reasonable time and prior to completing activities related to implementing the cold weather preparedness plan(s).
- WHY: This should ensure that the entity effectively addresses and communicates any changes made to its cold weather preparedness plans to operations and maintenance personnel.





#### **Important Details to Capture**



Entities should consider implementing internal controls designed to capture pertinent details, such as but not limited to:

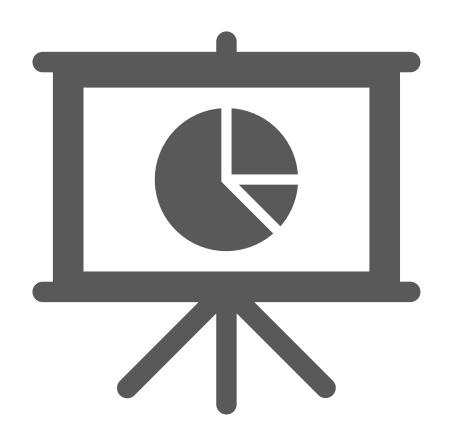
- The name of the personnel providing the training
- The name of the personnel being trained
- The date that the training took place
- The training materials used and provided
- ❑ <u>WHY:</u> Maintaining detailed records will allow the entity to better track the training of its operations and maintenance personnel.



Ensure that all operations and maintenance personnel responsible for implementing the cold weather preparedness plan(s) are provided generating unit-specific training pursuant to Requirement R7, and as written in the cold weather preparedness plan(s).

Consider implementing an internal control designed to capture any lessons learned to determine if the plans are producing the results expected when they are implemented.

WHY: Providing applicable and effective training to the entity's operations and maintenance personnel will ensure that the entity is addressing the reliability risks and effects of operating in cold weather.







It is critical that entities provide appropriate training to operations and maintenance personnel on an ongoing basis to ensure that planning for cold weather is adequate, is responded to proactively, and that any operating Emergencies are mitigated effectively.

By embedding internal controls into new or existing processes or procedures, your organization is likely to identify any compliance gaps that may lead to a potential noncompliance.







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## **Questions?**

