RELIABILITY
& SECURITY

Workshop - Salt Lake City, UT

March 26–27, 2024

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Self-Logging Program Roadmap

March 27, 2024

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Enforcement Attorney

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What You Will Learn and Why it Matters

- Understand the goal and purpose of the WECC Self-Logging Program

- See how the program has been updated and improved

- Dispel myths regarding the Self-Logging Program

- Learn the value the program brings to Registered Entities

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The "Why"

"A good compliance program addresses and processes noncompliance quickly and effectively, but a great compliance program is able to prevent noncompliance from happening at all."
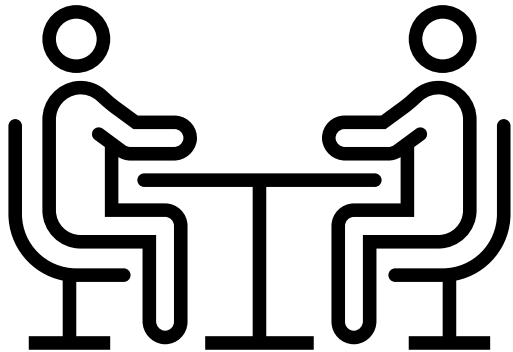
- Michael Scott ("Wayne Gretzky")

What is the WECC Self-Logging Program?

Opportunity for WECC to lean into its role as the regulator to work with stakeholders and the industry to promote reliability of the grid in the Western Interconnection.
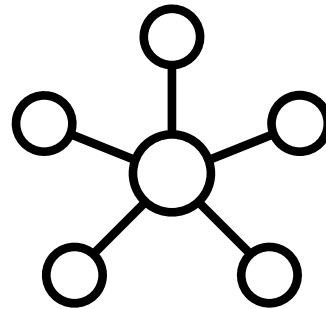
Opportunity for Registered Entities to improve their programs, allocate resources, and prevent/mitigate risks.

Affects not only Enforcement & Mitigation activities but informs others beyond Primary Compliance Contacts (PCC), such as WECC Audit Team Leads (ATL) who can improve their procedures/processes to those specific Registered Entities.

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The "How"
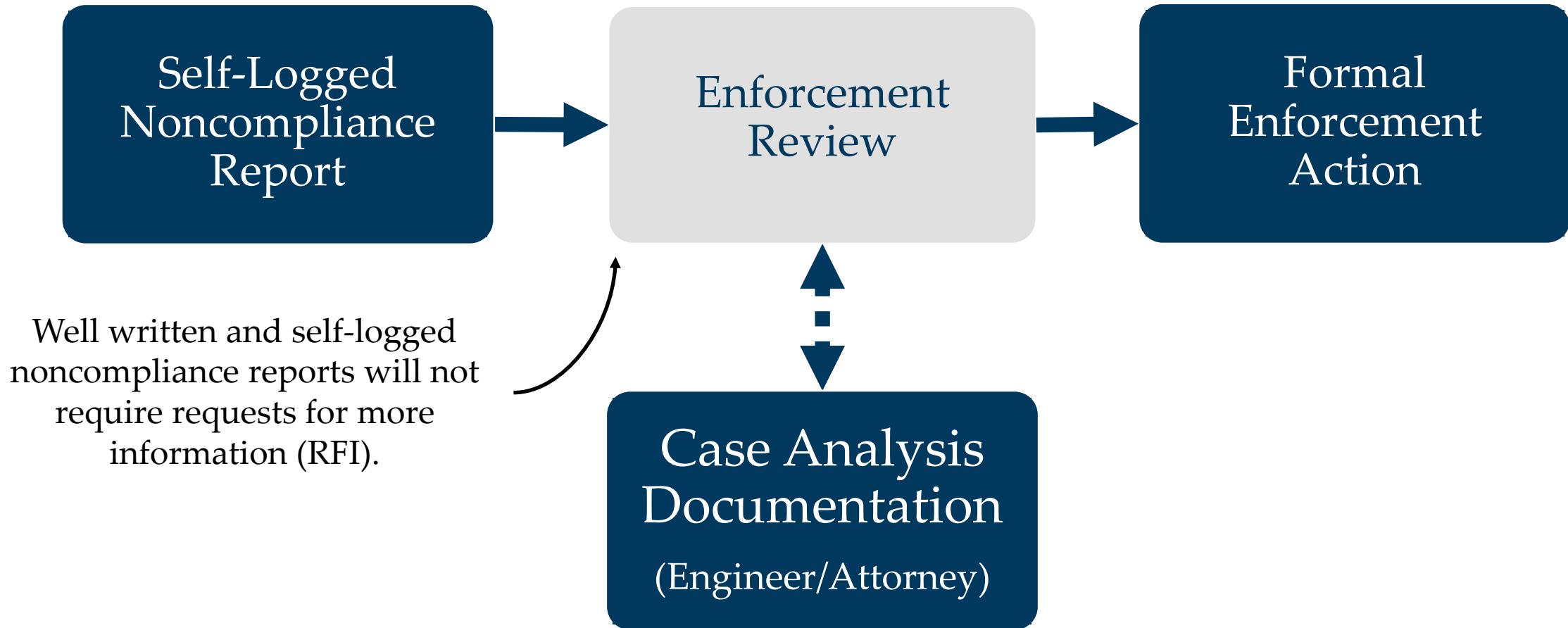
Expedited Reporting and Collaboration

Transparency and Trust Building

Risk Management and Resilience Building

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Value for Registered Entities

Address risks and prevent noncompliances from occurring

Enhanced transparency, communication, and relationship with WECC

Preserves resources for high-risk issues

Expedited Processing for minimal-risk Compliance Exceptions

Qualifying and participating demonstrates maturity of program

Streamlines oversight of minimal-risk issues

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Example—Expedited Processing

```
Self-Logged          Enforcement          Formal
Noncompliance    →     Review        →   Enforcement
Report                                     Action
```

Well written and self-logged noncompliance reports will not require requests for more information (RFI).

```
Case Analysis
Documentation
(Engineer/Attorney)
```

WECC

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Example—Assessment Insight

Insight on strengths of program
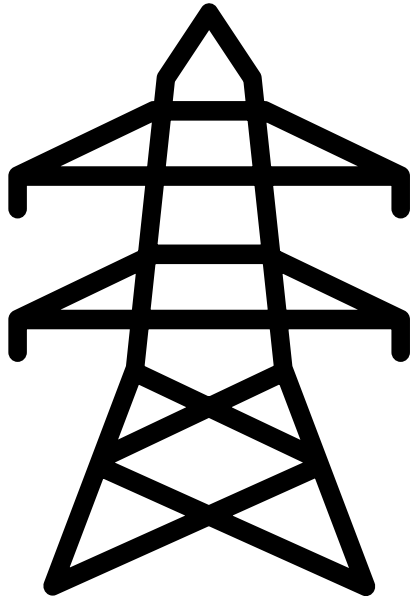
- What's working?

Addresses areas for improvement

- What can be refined?

Enhanced communication, transparency, and relationship/trust building with WECC with access to unique perspective as regulator—including the criterion assessed and what that means about the entity's program and internal controls

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Program Updates and Improvements

Renewed focus on Registered Entities in Coordinated Oversight and Multi-region Registered Entities (MRRE)

Revocation Procedures

Periodic Review

Additional Resources

Assessment Process

More to come!

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Myths Regarding the Self-Logging Program

A Registered Entity needs PCCs, a fully mature compliance program, robust internal controls, etc. to apply for Self-Logging.

✗ WECC evaluates the ability to identify, assess, and correct noncompliances through eligibility criteria.

Registered Entities should only apply if they are sure of acceptance.

✗ Self-Logging is an opportunity and provides tools for improvement.

Applying for Self-Logging is resource intensive.

✗ It's so easy, a caveman can do it.

Note: Entities should perform their own internal assessment against relevant criteria before applying, rather than waiting for WECC to identify and address issues.
Don't wait for feedback, but proactively tackle problematic areas—nobody knows your program like you do!

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In a Nutshell...

INDUSTRY EXPERTISE **+** **WECC SELF-LOGGING PROGRAM** **=** **WECC MISSION**

Commitment	Program	Mission
Collaboration between WECC and qualified Registered Entities seeking to enhance and streamline their overall CMEP experience.	Building industry resilience by assessing, identifying, and improving Registered Entity controls and programs to handle and process risks.	**To effectively and efficiently mitigate risks to the reliability and security of the Western Interconnection's Bulk Power System.**

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Upcoming Training

- Enforcement Fundamentals 2024
  - Self-Reporting/Self-Logging training sessions
  - June in Folsom, California
  - Virtual training in April
- If Registered Entity is accepted into WECC Self-Logging Program but can't attend training sessions before June 2024:
  - Notify WECC Self-Logging team. They will group you with other entities in your area to schedule training
- Attend these training sessions!
- Self-Logging Program is a privilege and a commitment, for you and for WECC
  - Registered Entities that have committed to improvement beyond what has been approved by WECC will benefit
  - Successful Registered Entities are expected to develop working relationships with WECC; more efficiently detect, submit, and process PNCs; and move toward a more reliable and secure electric grid in the Western Interconnection

Resources

NERC Self-Logging Program User Guide

https://www.nerc.com/pa/comp/CE/Enforcement%20Actions%20DL/Self-Logging%20Program%20User%20Guide.pdf

NERC Registered Entity Self-Report and Mitigation Plan User Guide

https://www.nerc.com/pa/comp/CE/Enforcement%20Actions%20DL/Registered%20Entity%20Self-Report%20and%20Mitigation%20Plan.pdf

If you have questions about the Self-Logging Program, contact us at selflogging@wecc.org.

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www.wecc.org