<Public>

WECC

Electric Reliability and Security for the West

Documentation Instructions Overview

The purpose of this document is to outline and clarify the information, reports, and data requested[1] by WECC to monitor compliance with the Reliability Standards as part of the audit scope.

WECC requires that Test Entity retain all evidence submitted for audit for the longer of (i) five (5) years or (ii) any retention period specified in a Reliability Standard or by FERC or another Applicable Governmental Authority. The obligation to retain audit evidence commences upon initiation of the audit. If the audit evidence is material to the resolution of a controversy (e.g. a potential noncompliance), the retention period for such audit evidence shall not commence until after the controversy is resolved. WECC may request audit evidence again at a later date.

Documentation and evidence submitted to demonstrate compliance with the applicable Reliability Standards must address **the entire monitoring period(s)** stated in the Audit Notification Letter (reference the ANP tab of the monitoring engagement in Align) unless a Reliability Standard specifies a different data retention period.

- A data retention period specified in a Standard that is shorter than the audit period does not absolve a registered entity from demonstrating compliance for the entire audit period. Should a registered entity desire to demonstrate compliance through other means[2], the WECC Audit Team will evaluate for sufficiency and appropriateness.

Entities are to comply with the evidence submittal dates[3] and documentation format[4] when uploading supporting compliance documentation to the Secure Evidence Locker. WECC will request Test Entity to resubmit any documentation or evidence not formatted in a manner conducive to developing a random sample or facilitating evaluation by the Audit Team. Per engagement scope (reference the General tab of the monitoring engagement in Align), WECC requests (additional detail below):

1. Completed Working Papers in Align
2. Completed Excel workbook(s)
3. Supporting evidence files

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[1] Appendix 4C, NERC ROP section 3.0
[2] Appendix 4C, NERC ROP section 3.1.4.2
[3] Notice of Audit Letter, Table of Important Due Dates
[4] Appendix 4C, NERC ROP section 3.1.1

Working Papers

Please use the Working Papers in Align to provide a brief explanation of how you comply with the Requirements applicable to your engagement scope. References to supplied evidence, including references to the appropriate page, are recommended. Reliability Standard Audit Worksheets (RSAW) are not provided with the Audit Notice Package (ANP), but if you wish to reference them for developing your compliance narrative, please visit NERC's RSAW[5] website.

1. Reference the **status** of any outstanding self-reports and or mitigation plans in each Working Paper, as applicable.

2. Ensure supporting evidence files associated with the Working Paper are listed in the Registered Entity Evidence table.

3. Align is a secure platform that is used by the ERO Enterprise to review and document information related to CMEP activities and is used to submit narrative information, while the Secure Evidence Locker is used to submit evidence and attachments. Certain information, such as data examples in the Data Handling in Align and the SEL[6] guidance should not be included in Align narratives.

Initial Requests for Information (RFI)

Please reference and complete the applicable RFIs (listed below) to assist in organizing and identifying the required information requested for engagement scope. Each RFI is submitted with the ANP (reference the General tab's Audit Request for Information in the monitoring engagement).

- "Pre-Audit Survey." Complete and return a signed copy.

- "O&P Evidence Spreadsheet." Review and complete the applicable tabs.

- "CIP Evidence Request Tool v8.1xlsx". Each detail worksheet with enforceable CIP Standards should be populated regardless of audit scope. Complete information ensures accurate Level 2 sampling is performed by the WECC Audit Team and supporting information is analyzed for post-audit Compliance Oversight Plan consideration.
    - Detailed instructions for using this tool are included in the document "CIP Evidence Request Tool User Guide v8.1.pdf."

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[5] https://www.nerc.com/pa/comp/Pages/Reliability-Standard-Audit-Worksheets-(RSAWs).aspx
[6] Data Handling in Align and the SEL, Appendix B

Evidence Structure

1. Submit all supporting evidence to the Secure Evidence Locker using the associated reference numbers applicable to engagement scope.

   o Providing an index of supporting evidence could be helpful to correlate file names with Standards and Requirements.

2. Adobe Portfolio

   a. Adobe portfolio is an effective way to compile supporting evidence.

   b. Please do not embed evidence within subfolders of the pdf portfolio.

   c. Submit all portfolios to the Secure Evidence Locker using the associated reference number.

   Example Portfolio:
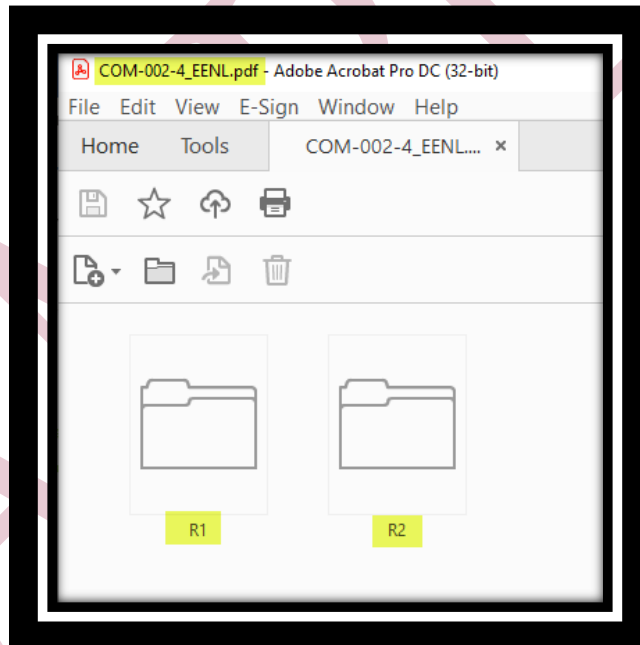
Evidence Files

1. WECC encourages the use of highlighting or other electronic means to direct the Audit Team to pages and/or paragraphs where evidence of compliance can be found for each Requirement.

2. Do not disable copying (copy and paste) of electronic evidence files. Where applicable, mark all evidence containing BES Cyber System Information (BCSI) per your CIP-011-2 R1 Information Protection Program.

3. Do NOT include any sensitive information in the file names you are uploading.

4. Compressed files (e.g., ZIP, ZIPX, SIT, GZ, TAR, RAR, ARJ, 7Z, 7ZX) as well as a number of file types that can contain executable malware are prohibited from upload.

   a. Acceptable file extensions: PDF, DOC(X), RTF, XLS(X), PPT(X), CSV, HTML, TXT, BMP, GIF, JPG, JPEG, PNG, TIF(F), SNAG, TIF, WAV, WMA, WMV, MP3, MPEG

   b. MSG file extensions (email messages) are not acceptable file extensions, files must be converted into .pdf format

5. Evidence file names should not exceed 75 characters, including spaces, and cannot contain any of the following special characters: < > : " / \ | ? * %

6. Submit all lists in a format that permits copying and pasting for the purposes of sampling, sorting, filtering, and analysis processes.

7. Where Adobe Acrobat PDF format is used, please submit searchable PDF files, and use bookmarks where applicable.

8. This is only an initial evidence submission; additional RFIs will be issued should the Audit Team require additional documentation or evidence to determine compliance.

Secure Evidence Locker Uploads

For Secure Evidence Locker technical concerns, please submit a help desk ticket to NERC at https://support.nerc.net. Training references for Secure Evidence Locker training can be found at https://training.nerc.net.

Evidence and RFIs must be uploaded using the associated reference numbers.

Should you have any questions or concerns regarding this document, please contact the CPC.