



**Reliability & Security
Workshop**

WECC

**March 17–18, 2026
San Diego, California**

Enforcement Philosophy

Kevin Spontak
Senior Enforcement Attorney

**Electric Reliability
& Security for the West**

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Introduction

The 'Why' behind Enforcement's philosophy update

- Build on momentum generated over past few years
- Need to keep up with grid transformation

A philosophy to increase reliability and security

- Four cornerstones of the philosophy
 - Risk focus, risk management, processing delays, communication
- Strengthen existing Enforcement programs

Other takeaways

- How the philosophy will affect entities
- Resources available today

Need for Enforcement to Continue Evolution

The transformation of the grid continues

Changes to generation mix

Majority of new units in next five years are IBRs

Traditional generation continues to retire

Changes to demand

High demand of data centers

General shift in electricity use

Change brings new risks

Enforcement continues to adapt

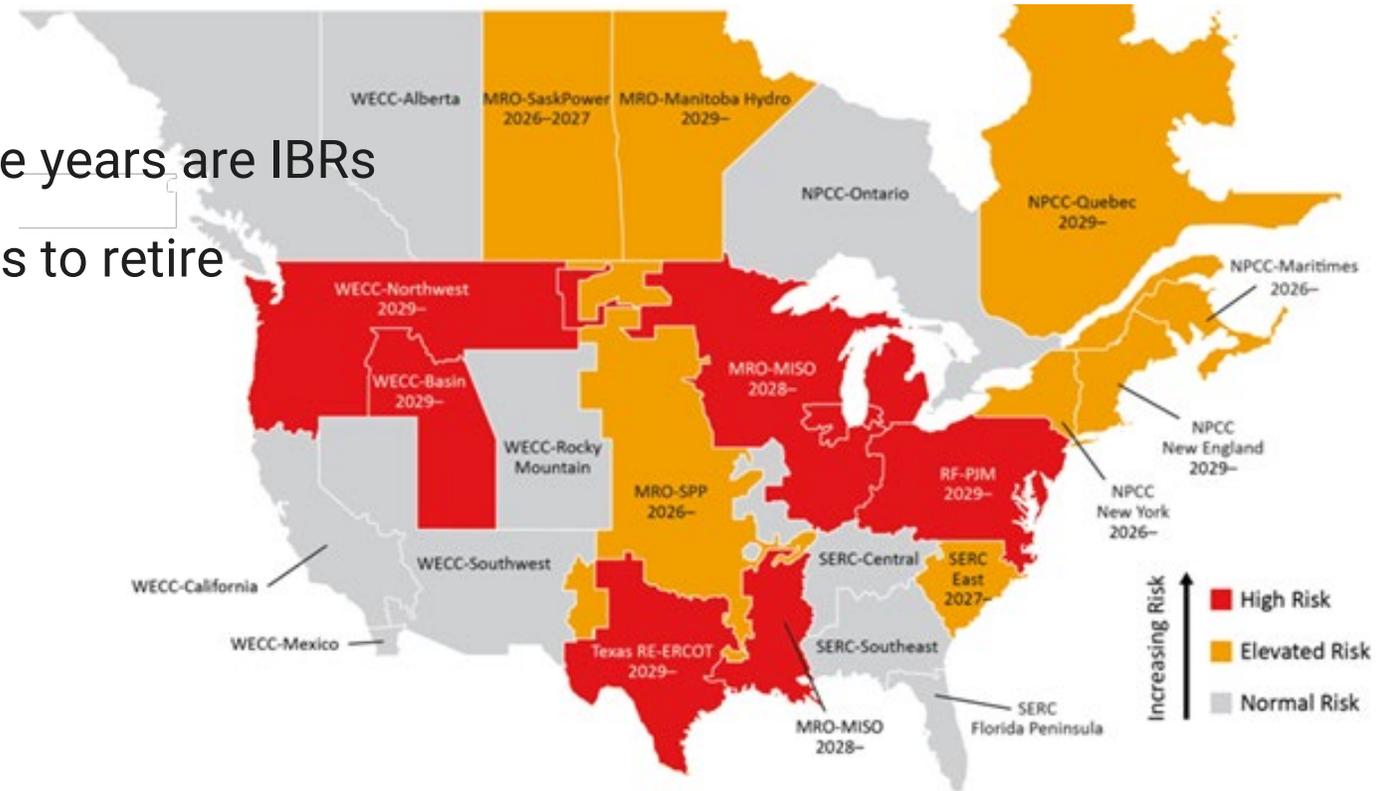


Figure 1: Risk Area Summary 2026–2030
Shows highest risk classification that occurs in the first 5 years and states initial year of occurrence

Four Cornerstones

- Continuous advancement of highest risk violations
- Identifying behaviors that increase reliability risk
- Identifying behaviors that affect WECC's ability to process
- Communicating positive and negative behaviors



Cornerstone: Advancement of Highest Risk Violations

Enforcement prioritizes its focus and actions on serious risk violations and behaviors that increase overall reliability risk and comprehensive mitigation strategies to address these risks

- Reinforcement and strengthening of existing priorities
- Timelines on settlements (SNOPs and FNOPs)
- Progress toward Real-Time processing
- Department and individual goals tied to processing timelines

What entities should expect?

- More settlements filed than previous years
- Turnaround time on highest risk violations shortened

Cornerstone: Reducing Reliability Risk

Enforcement will focus on and place greater weight on entity undesired behaviors ... resulting in either an elevation of the risk ... or disposition method ... because it increases overall risk the BPS.

- Individual minimal risks that could be aggregated
- Negative behaviors that do not rise to the aggravating factors
- Could result in higher risk or aggravation of disposition method
- End goal to promote reliability in Western Interconnection

Enforcement as Guardrails

Encourage positive behaviors

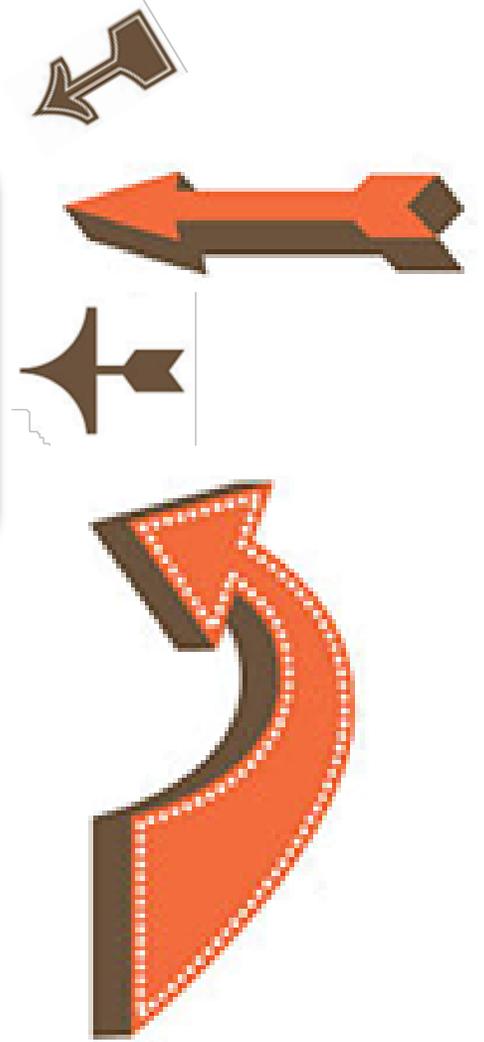
- Appropriate cooperation and coordination with WECC and neighbors
- Positive internal compliance program
- Promote reliability and security both internally and externally

An effective compliance program

- Mature processes and procedures
- Detective, preventive, and corrective internal controls
- Tone at the top and accountability



SELF LOGGING HERE



“Fast tracked” noncompliance processing
Presumed minimal risk
WECC “Stamp of Approval”

WICF Vision Statement

WICF provides entities that are subjected to NERC Reliability Standards compliance and enforcement within the Western Interconnection a venue to share knowledge and lessons learned regarding compliance matters and ideas to promote best practices that help ensure the reliable operation of the Bulk Electric System.

- Provide open forums to share lessons learned
- Promote consistent application of Standards
- Identify potential issues of compliance and reliability

Enforcement as Guardrails

Discourage negative behaviors

- Failure to coordinate with WECC and neighbors
- Failure to understand how footprint affects neighbors

An ineffective compliance program

- A lack of communication and understanding of reliability risks
- Limited or no internal controls
- Internal priorities other than reliability and security

Aggravating Factors

Aggravating Factor: Intentional Violation

When determining a monetary penalty NERC or the Regional Entity shall consider if the entity intentionally violated the Reliability Standard for purposes other than a demonstrably good faith effort to (1) avoid a significant and greater threat to the immediate reliability of the Bulk Power System or (2) preserve personnel safety.

Aggravating Factor: Violation Concealment, Resistance, Impediment, Non-Responsiveness, and Lack of Cooperation

NERC or the Regional Entity shall consider a significant increase to the monetary penalty if, based on its review of the facts, NERC or the Regional Entity determines that the entity concealed or attempted to conceal the violation or information necessary to investigate the violation.

Aggravating Factor: Management Involvement

If the entity's management or an individual within the high-level personnel of the organization participated in, directed, condoned, or was willfully ignorant of the violation, or tolerance of the violation by substantial authority personnel was pervasive within the entity as a whole or a unit of the entity, NERC or the Regional Entity shall consider a significant increase to the monetary penalty¹.

Full Notice of Penalty (FNOP) with presumption of double damages

¹ NERC Rules of Procedure: Appendix 4B NERC Sanction Guideline

Less than an Aggravating Factor

Business Prioritization over Reliability or Security

(Not quite “Intentional Violation”)

Lack of commitment or resources

Consistently immature program over multiple years

Management had Reason to Know

(Note quite “Management Involvement”)

Pervasive problems in specific area

NERC Alerts, feedback from WECC, etc.

Concealment, Resistance, and Lack of Cooperation as fourth cornerstone

What to Expect: Reducing Risk

Aggravation of Disposition Method:

Minimal Risk CE -> Minimal Risk FFT

Aggregation of Risk:

Minimal Risk CEs -> Moderate Risk FFT

Communication from WECC

- Language of the disposition
- Potentially a meeting with case manager or engineer
- Built into future compliance history

Cornerstone: Hindering WECC's Ability to Process

Behaviors in this context pertain to untimely extent of condition, root cause, and mitigation assessments, untimely or lack of detailed discovery responses often resulting in additional discovery requests, extensive or multiple extension of time requests, untimely mitigation and/or associated evidence submission (as needed), or other delays by the entity.

Individual minimal risks that could be aggravated

- Promote maturity in entity's programs
- Drive reliability in the Western Interconnection

Enforcement as Guardrails

Positive behaviors

- Prompt detection of noncompliance
- Properly scoped extent of condition reviews
- Accurate root cause analysis
- Timely remediation and mitigation activities and plans

Negative behaviors

- Extended instances of undetected noncompliance
- Failure to understand extent of noncompliance or violation
- Proposed root cause that fails to address risk
- Mitigation that fails to prevent recurrence

The Return of the Magnificent Seven



WECC Enforcement Fundamentals / NERC Self-Report and Mitigation Training

- Overview of ERC/WECC Process
- Information required for Self-Reports
- Best practices for mitigation

Upcoming Dates:

Summer 2026; Fall 2026

What to Expect: Reducing Impediments

Aggravation of Disposition Method:

- Minimal Risk CE -> Minimal Risk FFT

Behaviors that could rise to Aggravation:

- Missed deadlines (without communication)
- Incorrect or mis-scoped extent of condition reviews
- Incorrect or misleading responses to Requests for Information (RFI)
- Refusal to address WECC concerns

Cornerstone: Communicating Positive and Negative Behaviors

Continued partnership with WICF

- Provide guidance and communications as appropriate
- Promote reliability and security in the Western Interconnect

Self-logging program

- Potential expansion to showcase leaders in reliability
- Publicly acknowledge entities making a positive impact

Lessons learned presentations

- Lessons learned on difficult or complex remediation/mitigation
- Held other entities that may be struggling with the same issue(s)

Closing Thoughts

Mature Internal Compliance Program (ICP)?

Preventive, detective, and corrective internal controls implemented?

Want WECC to have a presumption of accurate reporting?

Self-Logging Program

[Self-logging_Program_2025.pdf](#)

Still understanding WECC expectations?

Need guidance on how to report reliability or security risks?

Want to know best practices on Self-Reports?

NERC Self-Report and Mitigation Training



ENGAGE WITH WECC





www.wecc.org | (801) 582-0353



155 N 400 W, Salt Lake City, UT 84103, USA