



**Reliability & Security
Workshop**

WECC

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

Navigating the Enforcement Process

Tobore Akasukpe
Staff Mitigation Engineer

Michael Dalebout
Manager, Enforcement Operations

Why Enforceable Standards?

U.S.-Canada Power System Outage Task Force

Final Report on the Implementation of the Task Force Recommendations

Natural Resources Canada
U.S. Department of Energy



Canada

September 2006

3. Implement

Group I: Insti Related to Re Recommend

Summary: In its
Task Force addi
issues related to
actions needed b
and regulators in
NERC, and the Reg
actions required
mandatory and enfo
ing the institution
management (e.g., ch
tion and governance
Reliability Councils), a
standing framework for
future blackout or grid-rel

Several of the 14 recommend
have more than one component
are a total of 24 Group I compon
tracked. Fourteen of these compon
fully implemented, and as the follow
substantial progress has been made on the
ing ten.

Table 3.1 summarizes the status of the implement
ation of each of the 24 components and identifies
the entities responsible for implementing the recom
mendation. As noted previously, some of the
recommendations involve discrete, one-time
actions while others involve policies or actions
that are to continue on an ongoing basis.

The following section describes the actions taken
to implement each component of the Group I rec
ommendations, and identifies any further actions
planned to fully implement the recommendations.

⁶Final Blackout Report, p. 141.

⁷Energy Policy Act of 2005, Pub. L. No. 109-58 (2005).

⁸Rules Concerning Certification of the Electric Reliability Organization; and Procedures for the Establishment, Approval, and Enforcement of the Electric Reliability Standards (FERC Order No. 672), 114 FERC ¶ 61,104 (2006).

Force Recommendation

R1. Appropriate branches of government in the United States and Canada should take action as required to make reliability standards mandatory and enforceable, and to provide appropriate penalties for non-compliance.

To emphasize the importance of making reliability standards mandatory and enforceable, the Task Force focused its first recommendation on this fundamental goal. The recommendation has five components:

1. A. The U.S. Congress should enact the liability provisions proposed in the comprehensive energy bill.

Public standards in the U.S. FERC to issue regulations for the certification of an ERO, review applications from parties seeking certification, and certify one ERO.

On February 3, 2006, FERC issued an order pursuant to Subtitle A (Reliability Standards) of EPAct 2005 setting forth requirements for the certification of an ERO.⁸ NERC was the only application submitted to FERC seeking certification as



This Photo by Unknown Author is licensed under CC BY-NC-ND



Primary Enforcement Resources



WECC

NERC
NORTH AMERICAN ELECTRIC
RELIABILITY CORPORATION

Registered Entity Self-Report and Mitigation Plan User Guide

October 15, 2024

RELIABILITY | ACCOUNTABILITY

3353 Peachtree Road NE
Suite 600, North Tower
Atlanta, GA 30326
404-446-2560 | www.nerc.com

NERC
NORTH AMERICAN ELECTRIC
RELIABILITY CORPORATION

Compliance Monitoring and Enforcement Program

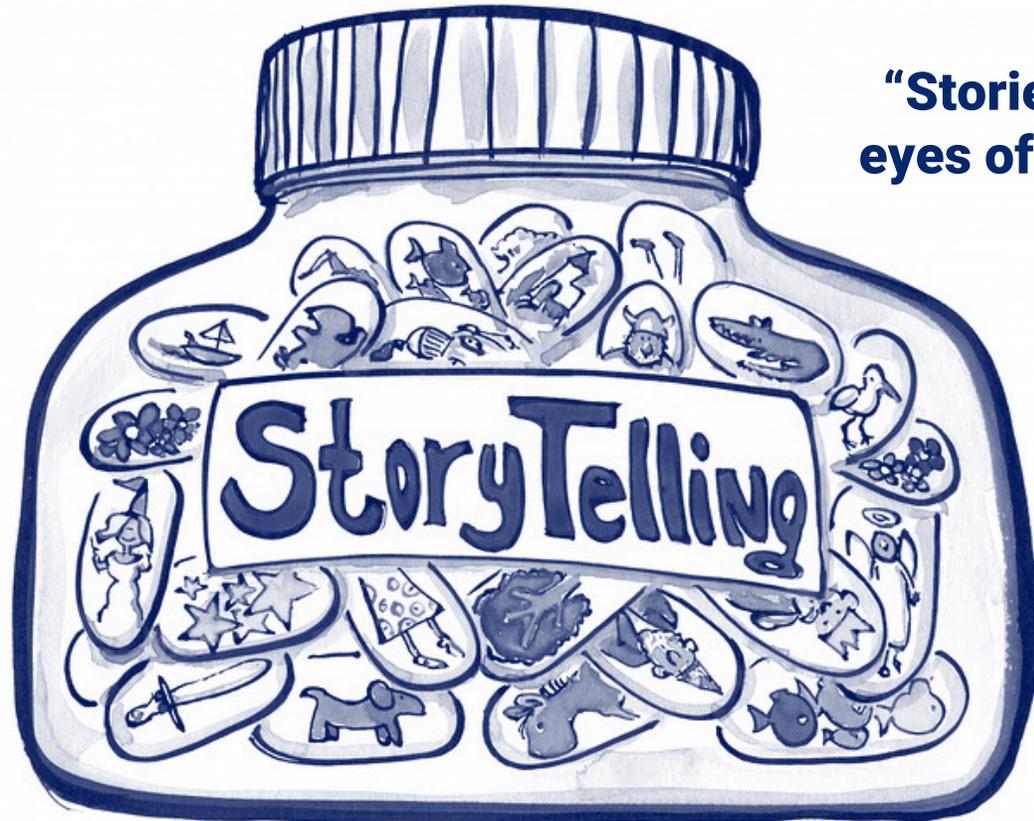
Appendix 4C to the Rules of Procedure
Effective: May 19, 2022

Table of Contents

1.0 INTRODUCTION	4
2.0 COMMUNICATION WITH ORGANIZATIONS RESPONSIBLE FOR COMPLYING WITH RELIABILITY STANDARDS	4
3.0 ANNUAL IMPLEMENTATION PLAN	4
4.0 COMPLIANCE MONITORING PROCESSES	4
4.1 Compliance Audits	5
4.2 Self-Certifications	10
4.3 Spot Checks	10
4.4 Compliance Investigations	11
4.5 Self-Reports	14
4.5A Self-Logging	14
4.6 Periodic Data Submittals	14
4.7 Complaints	15
4.8 Preliminary Screen	16
4A.0 ENFORCEMENT DISCRETION	17
4A.1 Compliance Exception Process	17
4A.2 FFT Process	17
5.0 ENFORCEMENT ACTIONS	18
5.1 Assessment of Potential Noncompliance	19
5.2 Notice of Preliminary Screen	19
5.3 Notification to Registered Entity of Alleged Violation	19
5.4 Registered Entity Response	20
5.5 Hearing Process for Compliance Hearings	21
5.6 Settlement Process	21

RELIABILITY | RESILIENCE | SECURITY

Enforcement is About Telling Your Story



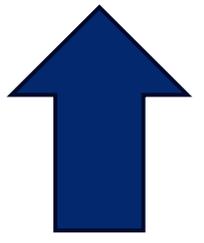
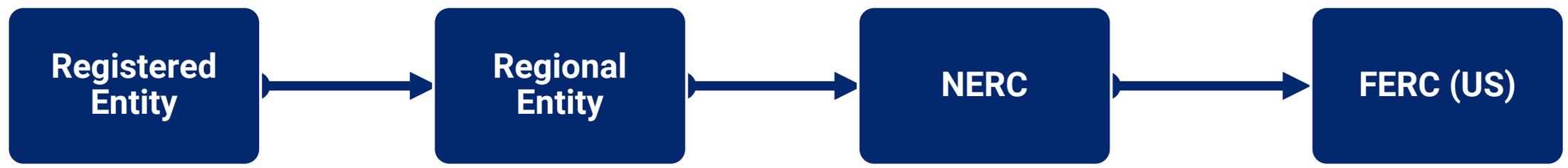
“Stories create community, enable us to see through the eyes of other people, and open us to the claims of others.”

Peter Forbes

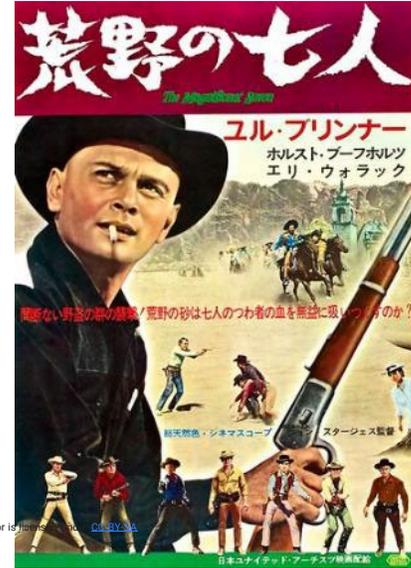
[This Photo](#) by Unknown Author is licensed under [CC BY-ND](#)



Enforcement Handling



The Magnificent Seven

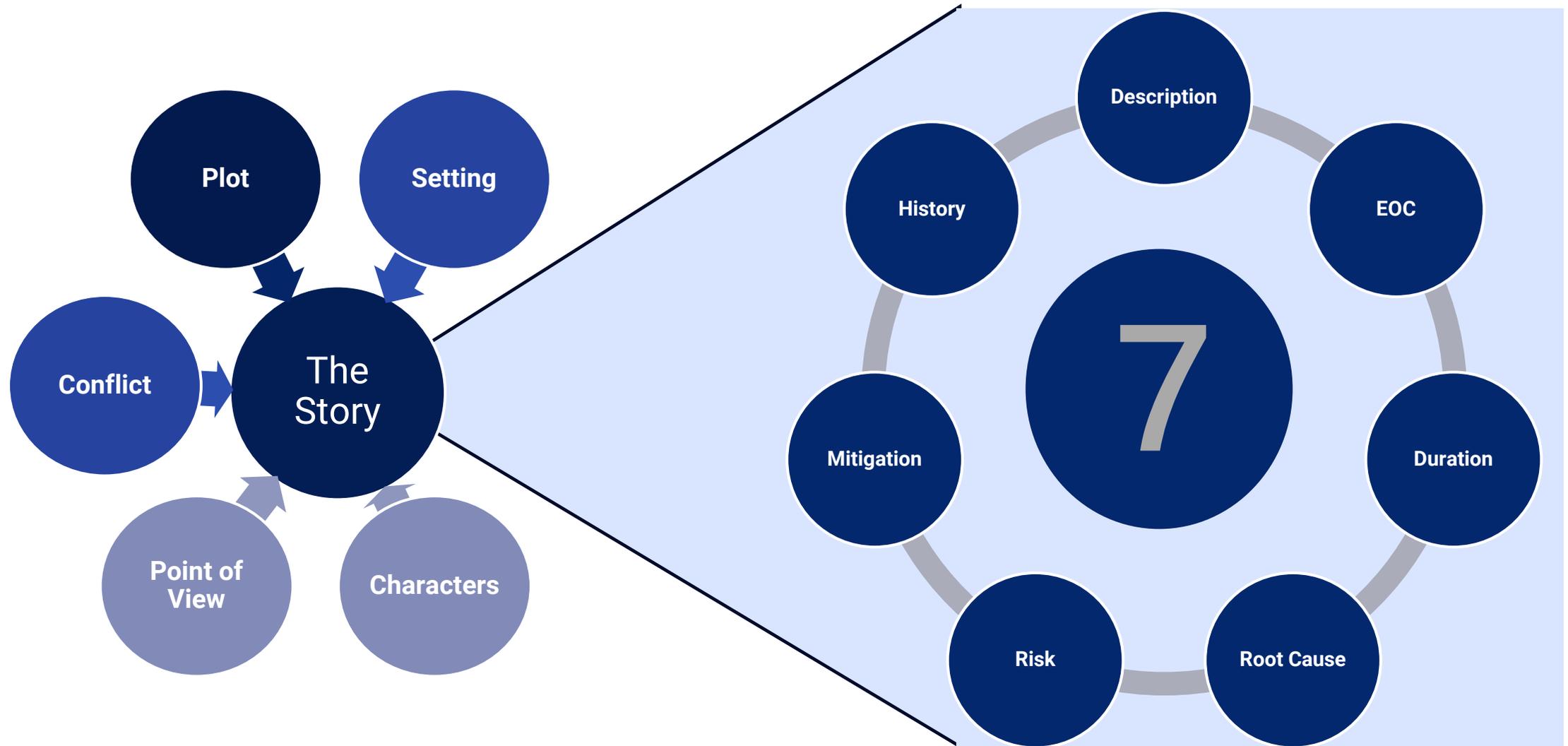


Different Movies.
Different Actors.
Different Settings.
Same Magnificent Seven.

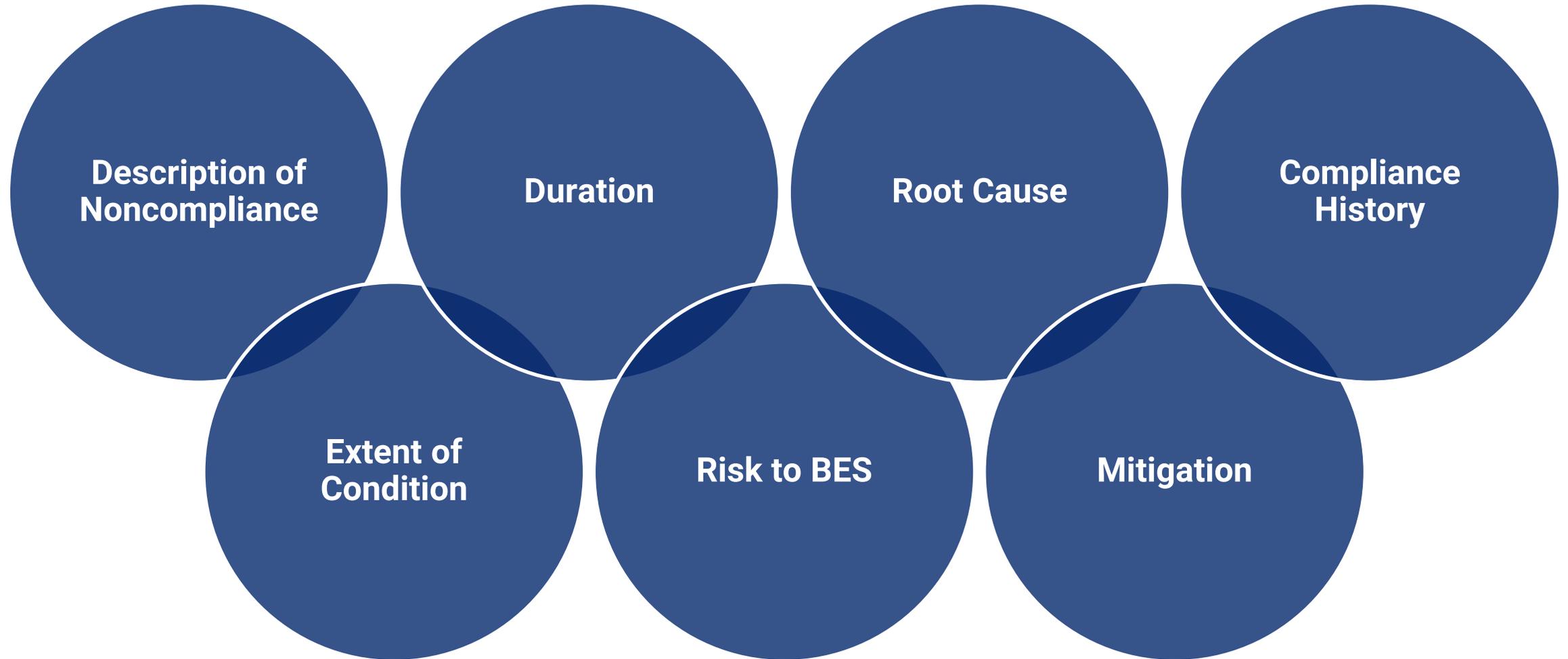
Different Events.
Different Standards.
Different Facts.
Same Magnificent Seven.



Traditional vs. Enforcement Story Telling



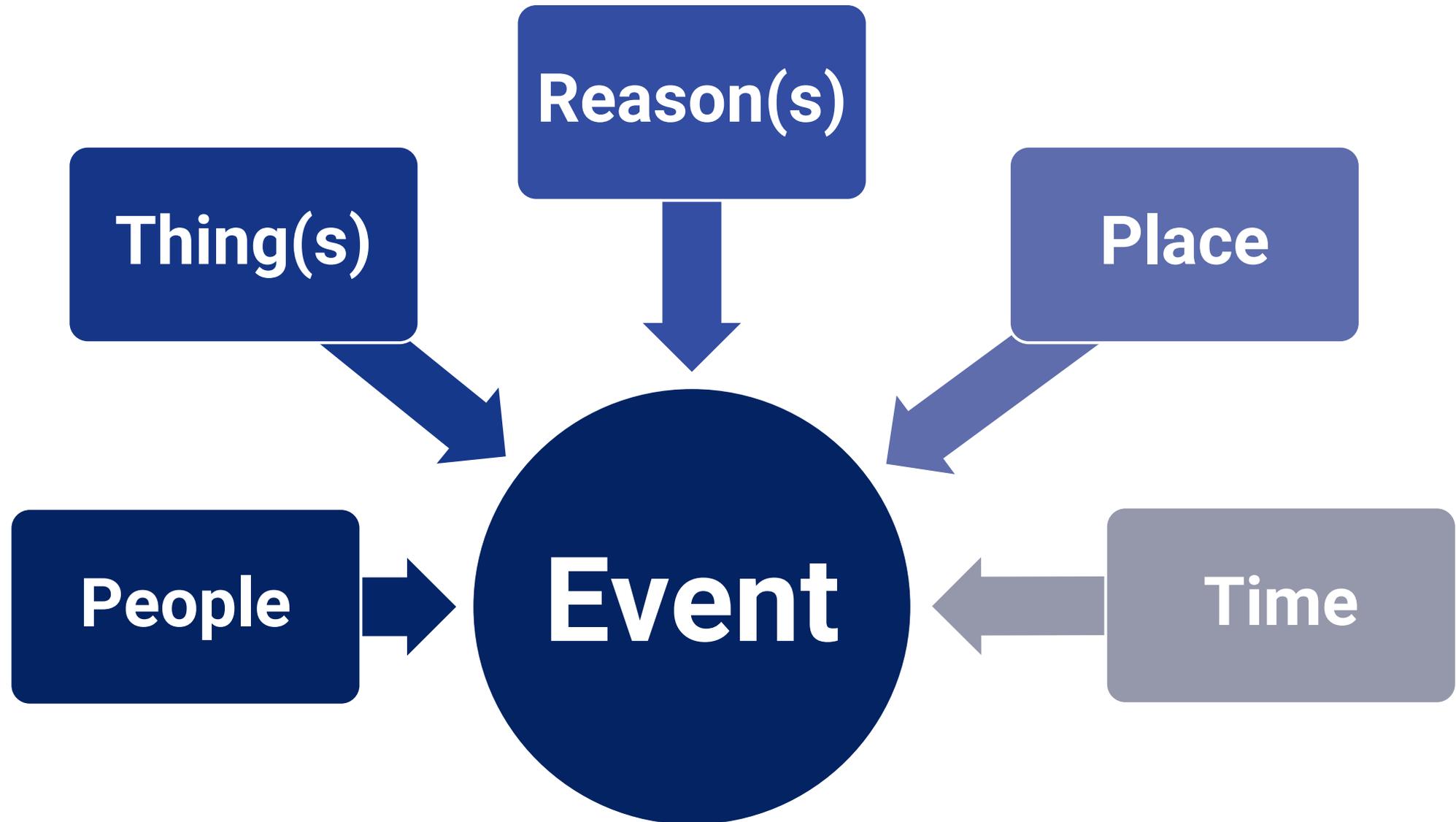
Magnificent Seven





Description of Noncompliance

Description of Noncompliance



Concept Example

Description of Noncompliance

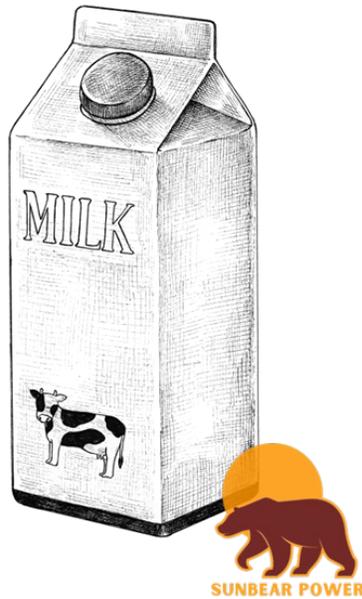
Conceptual Example

MILK-001

Application of concept to non-NERC situation



Description of Noncompliance



Operations Manual: MILK-001

Pasteurized Milk must be discarded before it has exceeded the sell by date by more than 14 days or undergone a noticeable negative change in smell, texture, color, or taste.

Fact Pattern

- An employee recently discovered milk in the Sunbear break room that did not have the color, consistency, or smell of fresh milk.
- After determining the milk had spoiled, the employee threw out the remainder of that milk container as well as the second container in the fridge with the same food safety date.
- The employee then submitted an internal compliance report, attached a video of the spoiled milk as it was being poured out, and provided a picture of the food safety date.



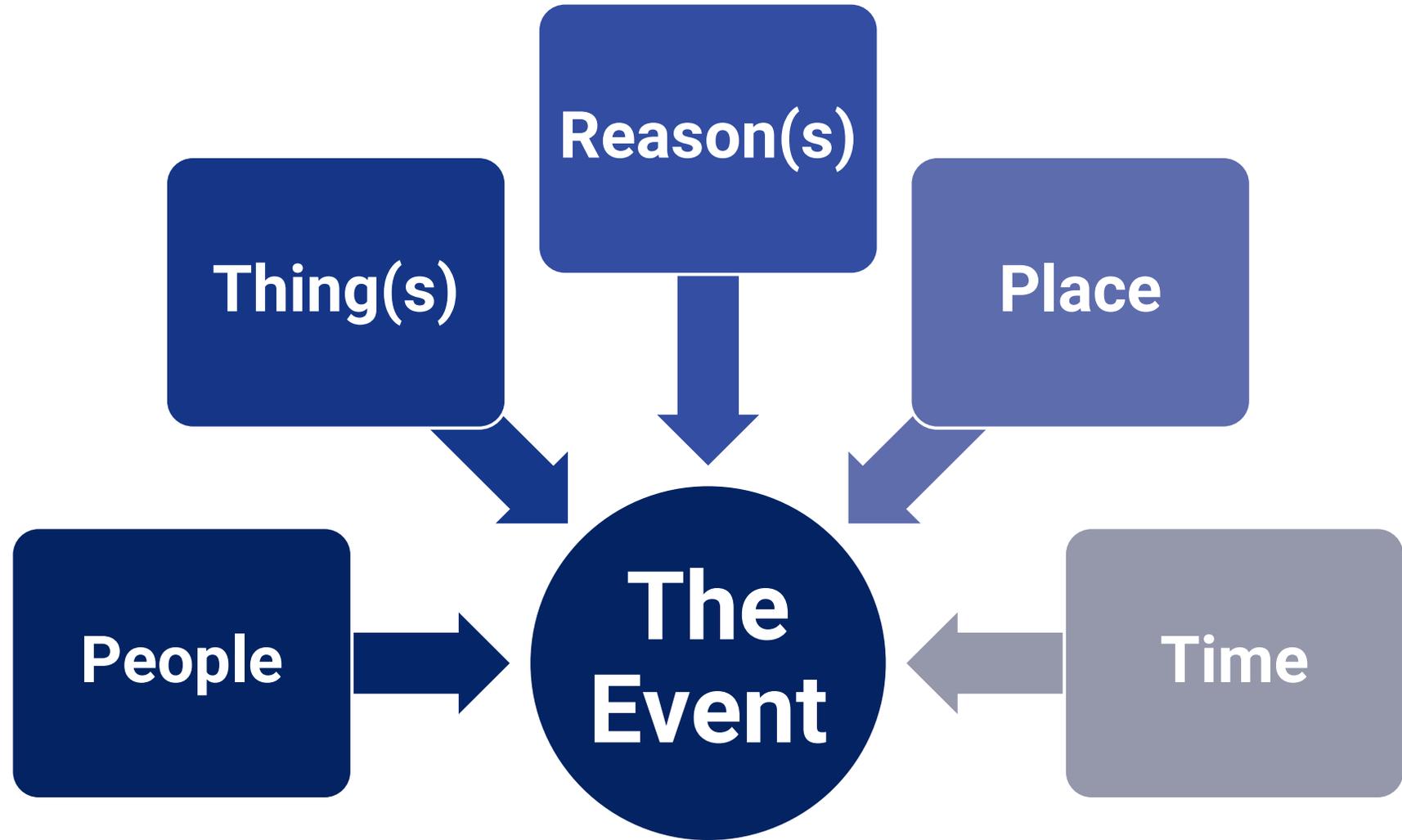
Description of Noncompliance

Original Description of Noncompliance

Sunbear violated DAR-MILK-001 because it found two gallons of milk that had spoiled in a breakroom fridge.



Description of Noncompliance



Description of Noncompliance

Improved Description of Noncompliance

While preparing coffee on Monday, July 21, 2023, an employee noticed the texture of their milk didn't look right and determined, based on the milk's color, consistency, and smell, that the milk had gone bad. The employee threw the container of bad milk and a second container of milk from the same fridge with the same food safety date into the trash. There are two refrigerators on site, so employees used milk from the cafeteria, where the milk had not spoiled, for their coffee until new milk could be brought into the small break room.



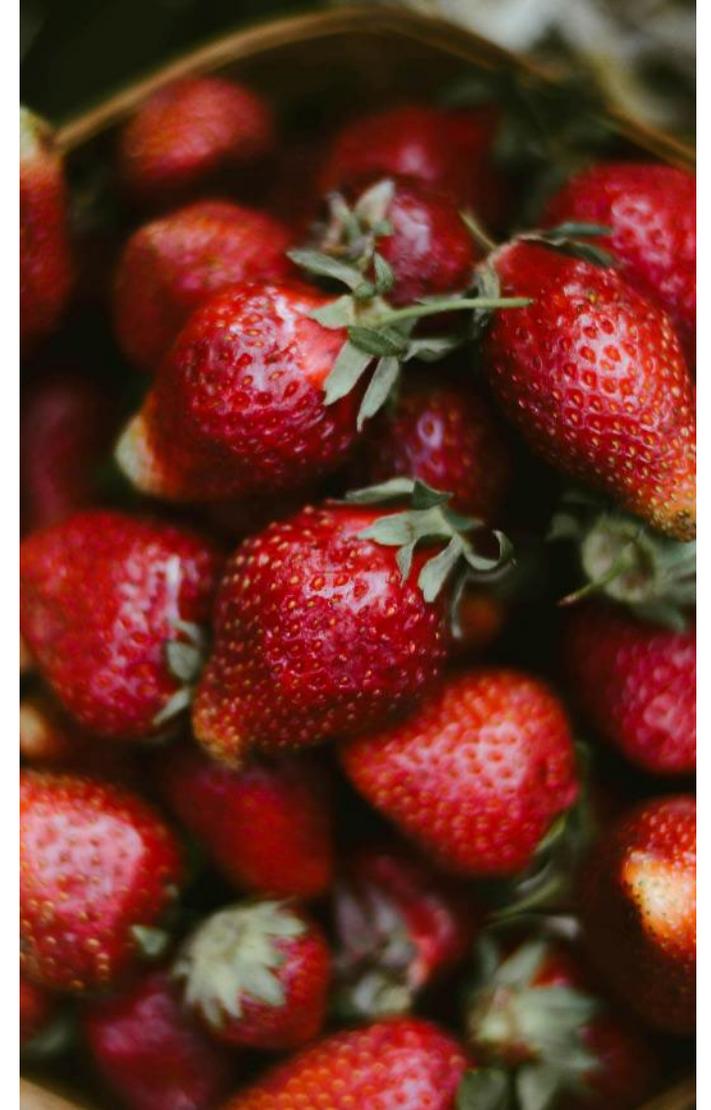


Extent of Condition

Conceptual Foundations

Extent of Condition Review: Strawberry Container

- If the top strawberry has mold, how likely are you to find mold on other strawberries?
- What about a second purchased box?
- What if they were stored in freezer?





Conceptual Foundations

An effective EOC review / assessment helps to:

- Identify all related noncompliance across the enterprise
- Identify trends, weaknesses, and strengths
 - Most effective programs use predetermined established communications plans to let everyone know how to share and document data
- Confirm the cause and inform mitigation efforts
- Ensure complete mitigation and prevent recurrence
- Identify corrective actions and internal controls

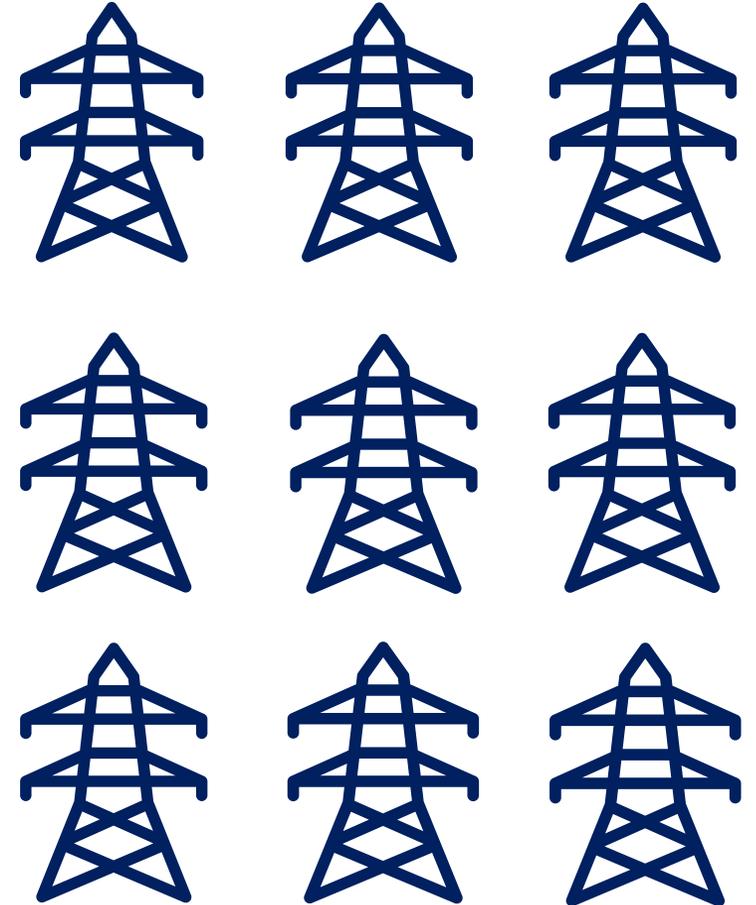
NERC Self-Report & Mitigation Guide

The CEA and NERC should be able to understand how the registered entity determined that the level of EOC assessment was appropriate, since the scope of the assessment may differ based on the facts of the noncompliance.



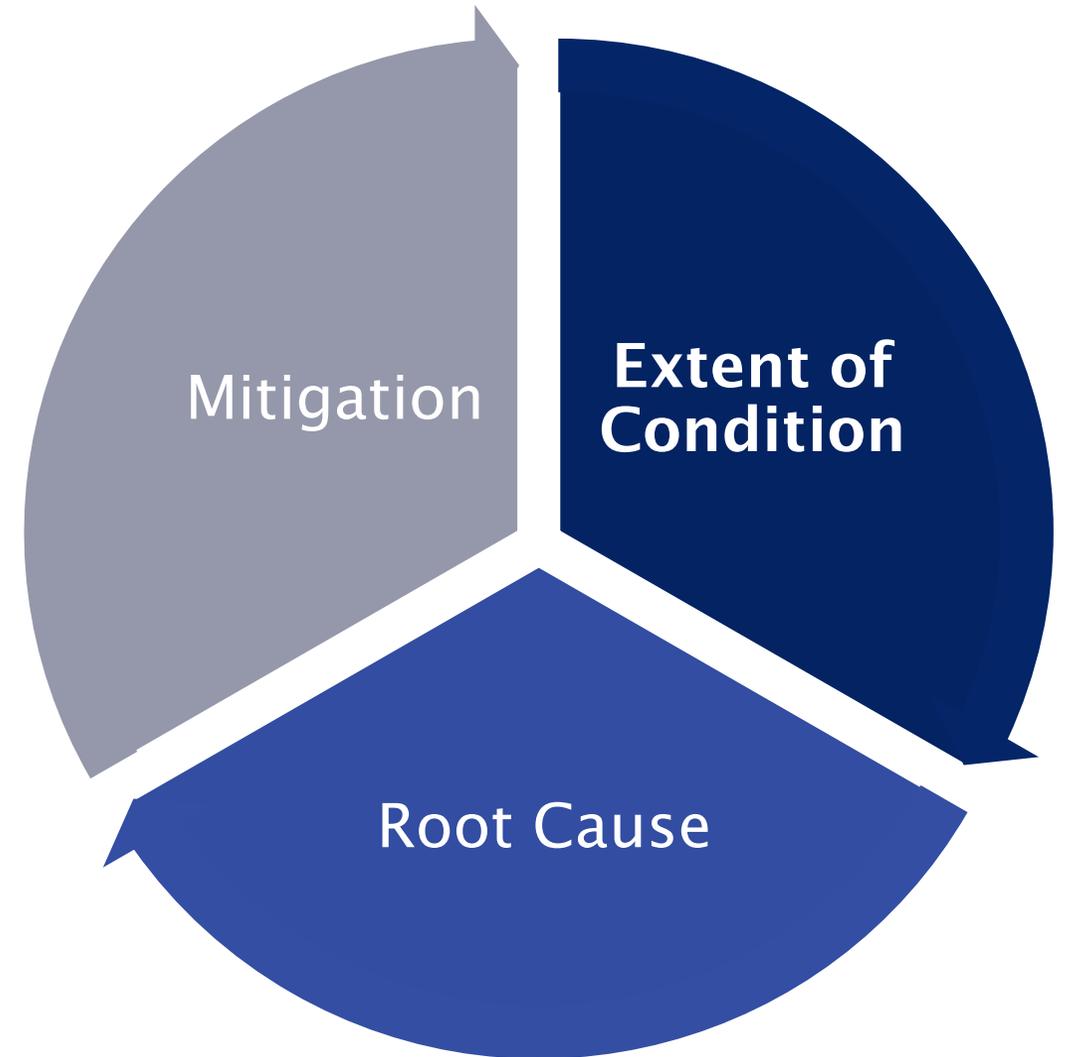
Determining EOC Magnitude

- Be purposeful and thorough in planning and executing.
- Don't arbitrarily limit the scope.
- Look to assess whole entity organization and all affiliates.
- EOC depends on noncompliance.
- Know why you are excluding items and document the reason(s) in your methodology.



R.E.M. Cycle

- Extent of condition determines how far the identified risk may exist within the organization.
- If the scope expands or narrows, mitigation measures must be adjusted to address the full population of affected systems, processes, or personnel.
- Incomplete extent of condition analysis results in incomplete mitigation and elevated recurrence risk.



Concept Example

Extent of Condition Review

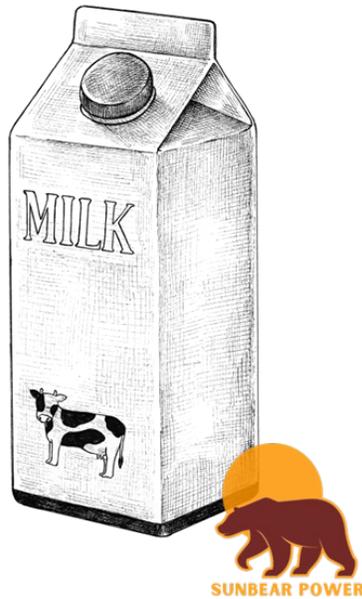
Conceptual Example

MILK-001

Application of concept to non-NERC situation



Extent of Condition Review



Operations Manual: MILK-001

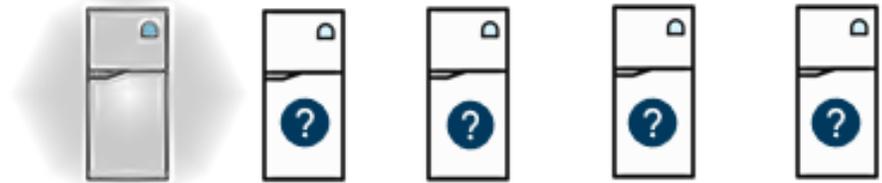
Pasteurized Milk must be discarded before it has exceeded the sell by date by more than 14 days or undergone a noticeable negative change in smell, texture, color, or taste.

Extent of Condition Review

We're all containers in the refrigerator checked?



Have all other refrigerators been inspected?



Are there any other locations with stored milk?



Extent of Condition Review

Original EOC Assessment

- No other spoiled milk was found.



Extent of Condition Review

Improved EOC Assessment

- Sunbear performed an EOC by inspecting all milk, in all refrigerators.
- Sunbear identified seven gallons of milk stored in five refrigerators at three locations.
- One of the seven gallons of milk was determined to be fifteen days past the food safety date but showed no other signs of spoilage.
- No other spoiled milk was identified, and no other milk exceeded its "best by" date.





EOC Assessment – Example 1 Questions to Consider



What time frame of records were reviewed?

Why was this time frame chosen?

What specific analysis was performed?

Who performed the analysis?

Were all applicable locations or facilities analyzed?

Were there any other similar standards that could be affected?

Does the EOC analysis make sense given all the causes?

Extent of Condition Review

Improved EOC Assessment

- Sunbear performed an EOC by inspecting all milk, in all refrigerators.
- Sunbear identified seven gallons of milk stored in five refrigerators at three locations.
- One of the seven gallons of milk was determined to be fifteen days past the food safety date but showed no other signs of spoilage.
- No other spoiled milk was identified, and no other milk exceeded its "best by" date.

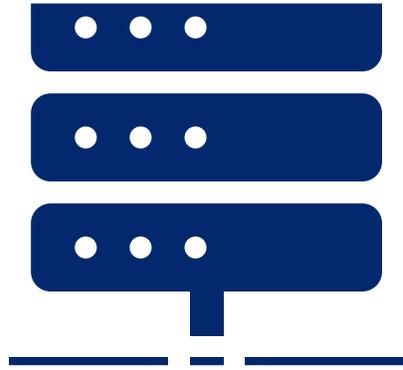


EOC – Operations and Plannings

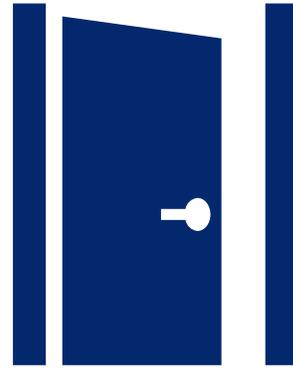
- Sunbear determined the cause of the noncompliance was a documentation error in the aerial inspection log of the 230 kV Point A to Point B line that should have initiated a ground inspection of the part of this line that had the MVCD encroachment. Sunbear performed a ground inspection of all its lines to determine whether there were any other MVCD encroachments. Sunbear found no other MVCD encroachments.
- Sunbear's SMEs also reviewed 100% of the previous year's aerial inspection logs to see whether there were other documentation errors that led to or could have led to other instances of noncompliance. Sunbear found identical errors in its aerial inspection logs for 3 out of 52 of its FAC-003 applicable transmission lines that were not violations of any standard requirements but were documentation errors that needed to be corrected to prevent future noncompliance.



EOC – Critical Infrastructure Protection



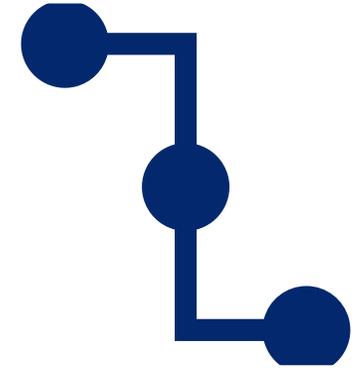
System Routers & Switches



Secured Access Areas



Persons with Access



Digital Networks



Describe which equipment was checked and why you stopped there.

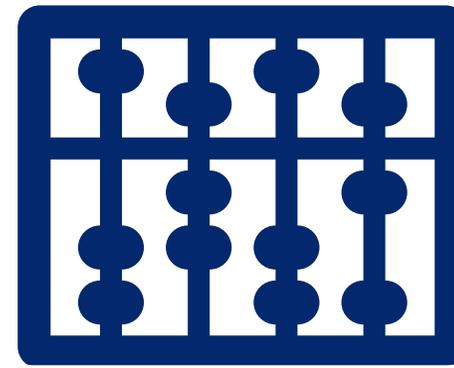
EOC – Operations and Planning



Facilities



Documentation



Calculations

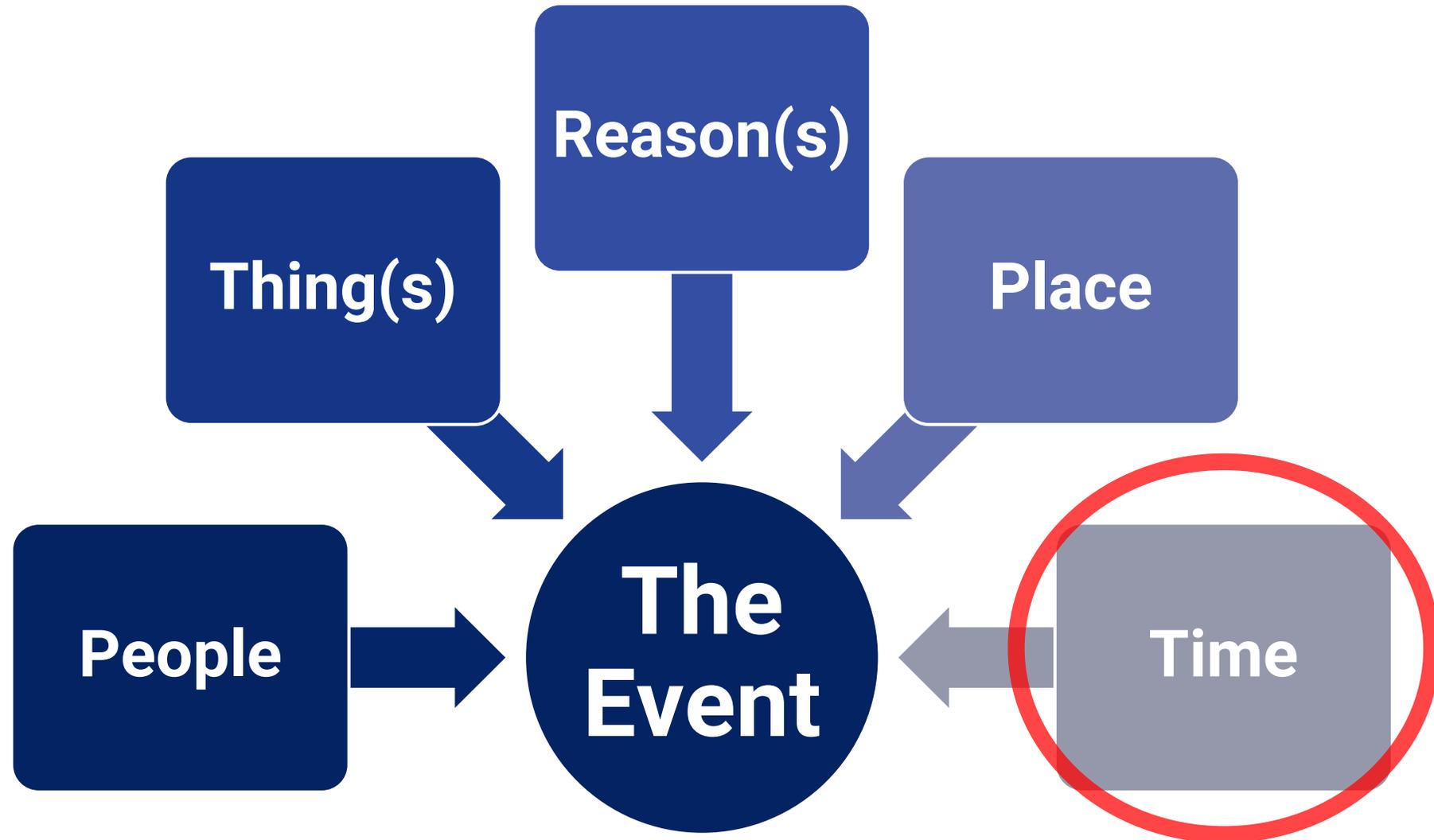


Procedures



Duration

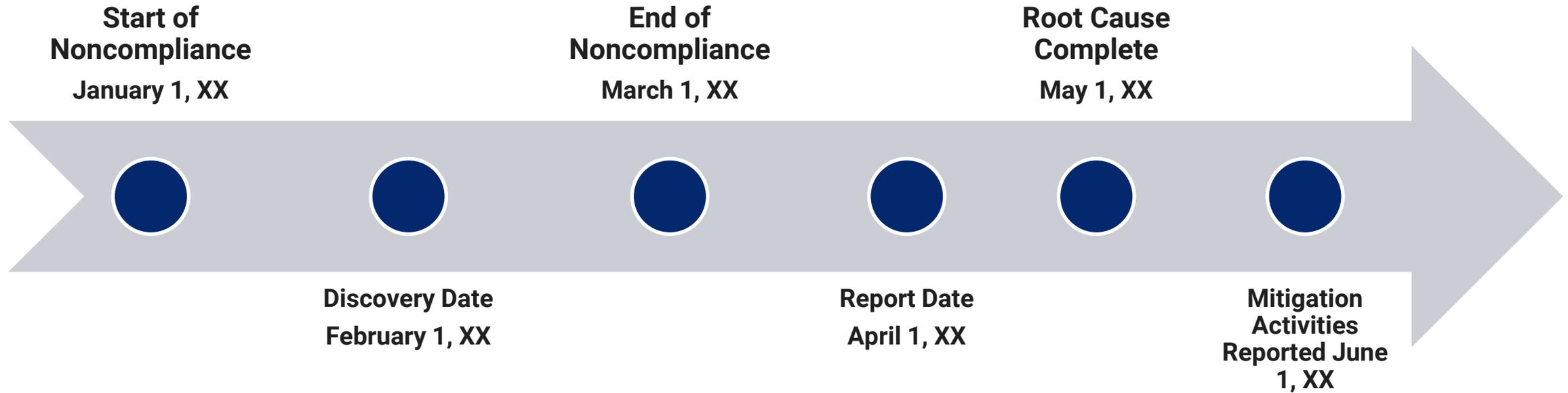
Duration





Duration

The time of each noncompliance must be understood from beginning to end.





Duration Requirements

Start Date

The start date is the earliest known occurrence of noncompliance, the enforceable date of the Standard, or the last date of known compliance.

End Date

The end date would be when the entity corrected (remediated) the noncompliance, which is not necessarily the mitigation completion date.

Explanation

Explain why and how this noncompliance started, when it ended (*remediated*).



Concept Example

Duration of Noncompliance

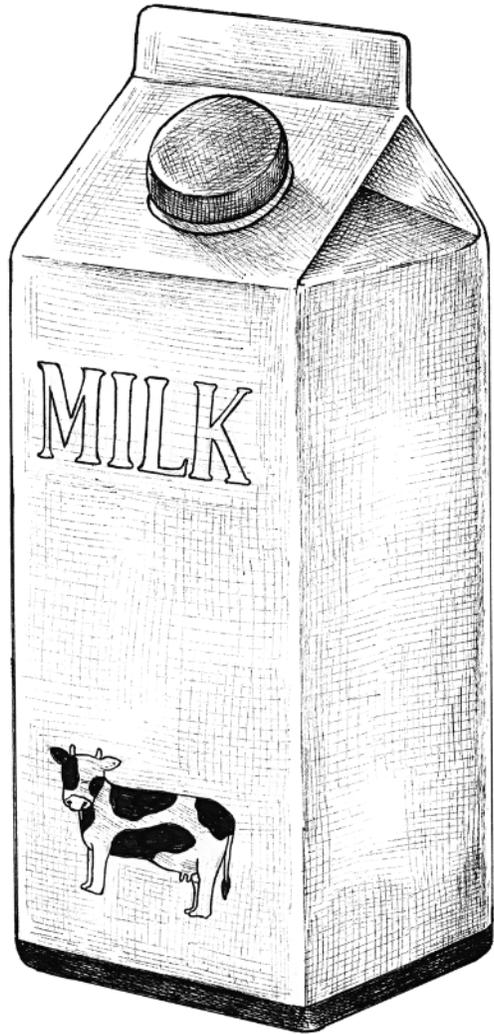
Concept Example

MILK-001

Application of concept to non-NERC situation



Duration

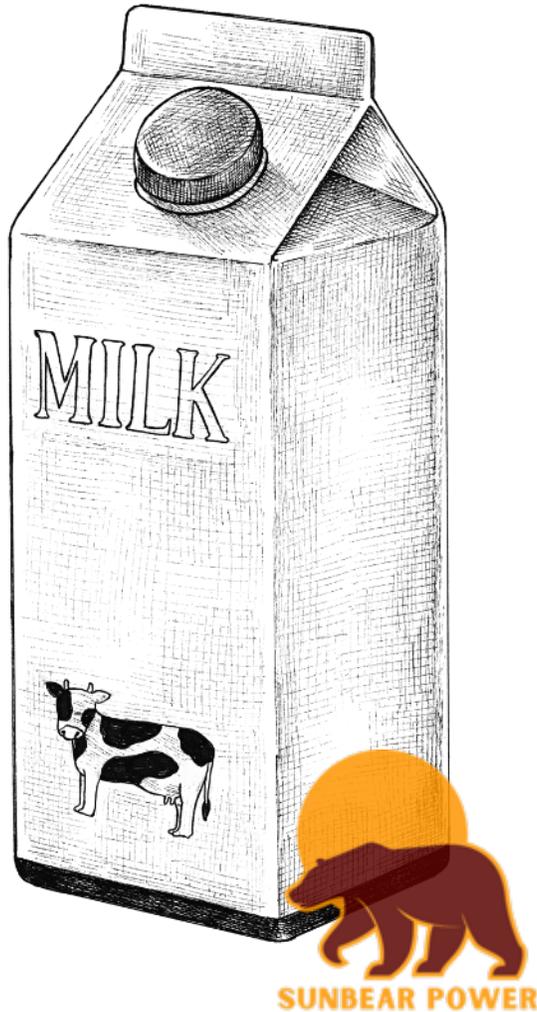


Food Standard:

DAR-MILK-001

**Pasteurized Milk must be
discarded before it spoils**

Duration of Noncompliance



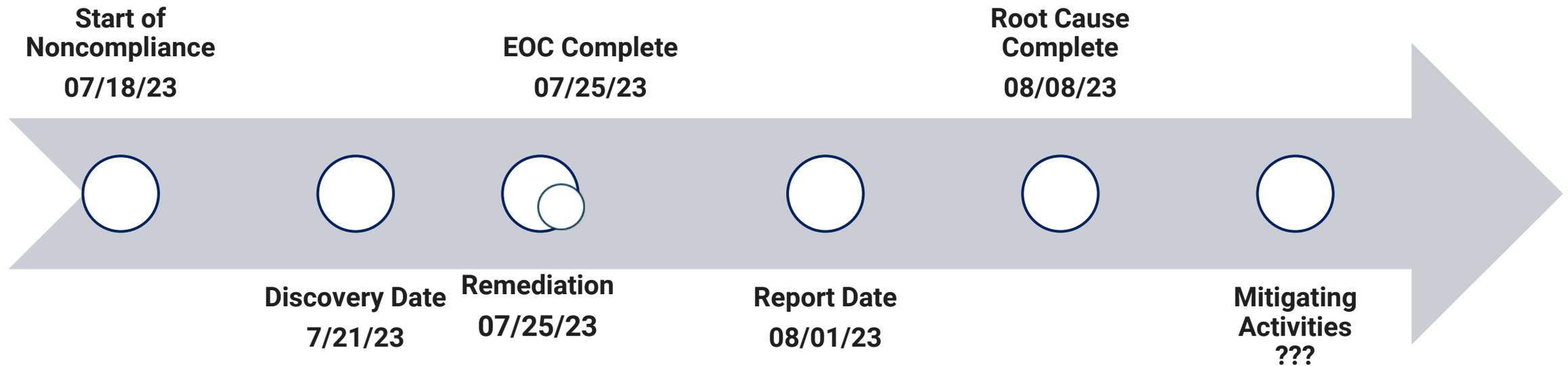
Original Duration Information

Sunbear employees discovered and discarded spoiled milk on July 21, 2023.

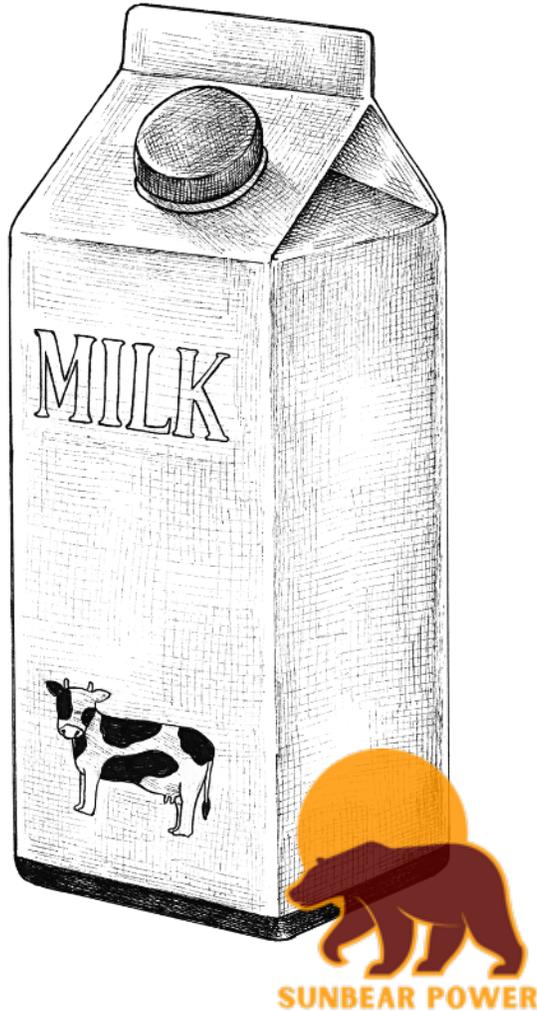


Duration

The time of each noncompliance must be understood from beginning to end.



Duration of Noncompliance



Improved Duration Information

Sunbear employees found spoiled milk on July 21, 2023. Two gallons had an expiration date of 7/25/23, but were chunky and odiferous. Based on the EOC performed, one additional gallon of noncompliant milk was identified. These had an expiration date of 7/10/23 and were discovered and discarded on July 25, 2023.

Self Check Questions

Questions to consider?

What times did this noncompliance start and end?

Why did it start at that date and time?

Why did it end at that date and time?

If there were multiple instances, when did they start and end and why?

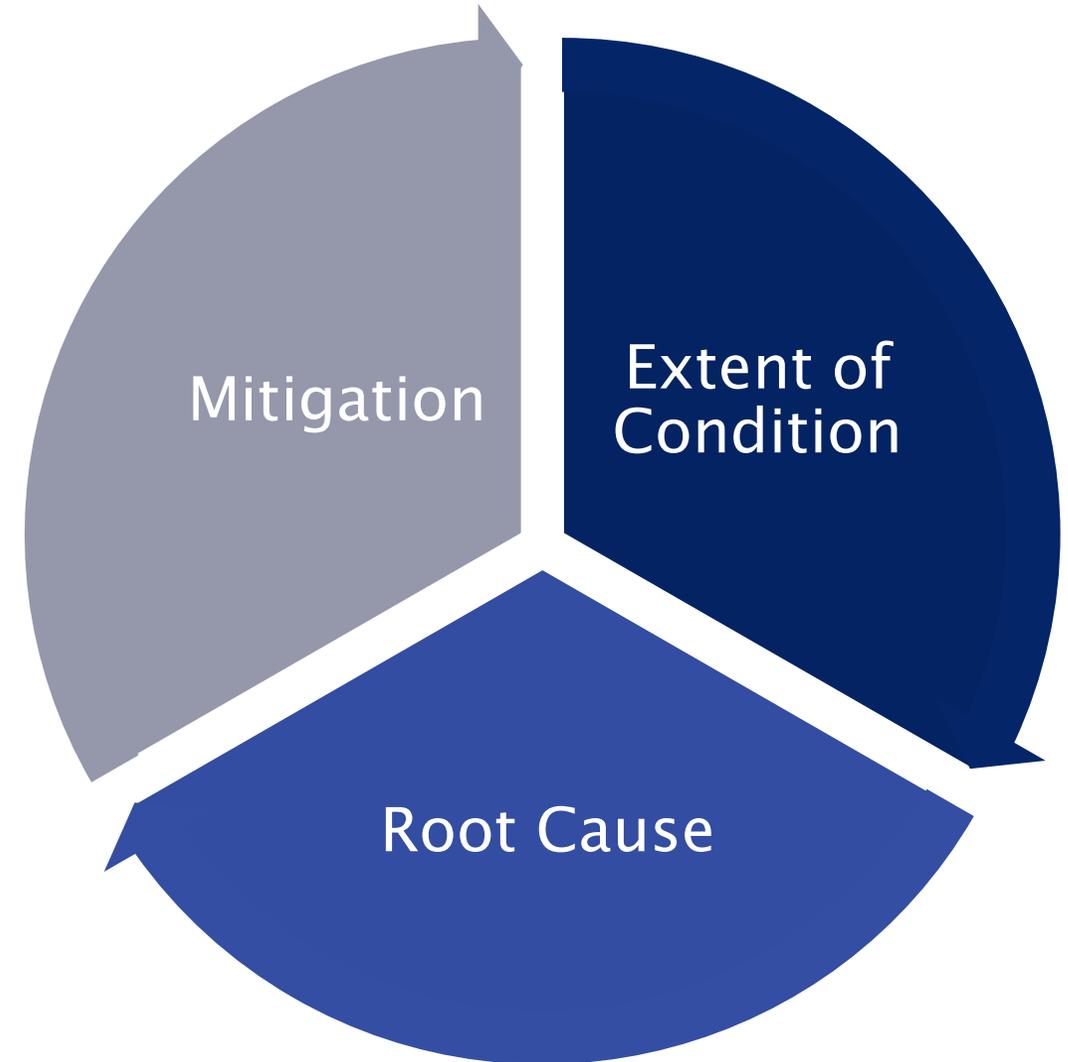
SUNBEAR POWER



Root Cause

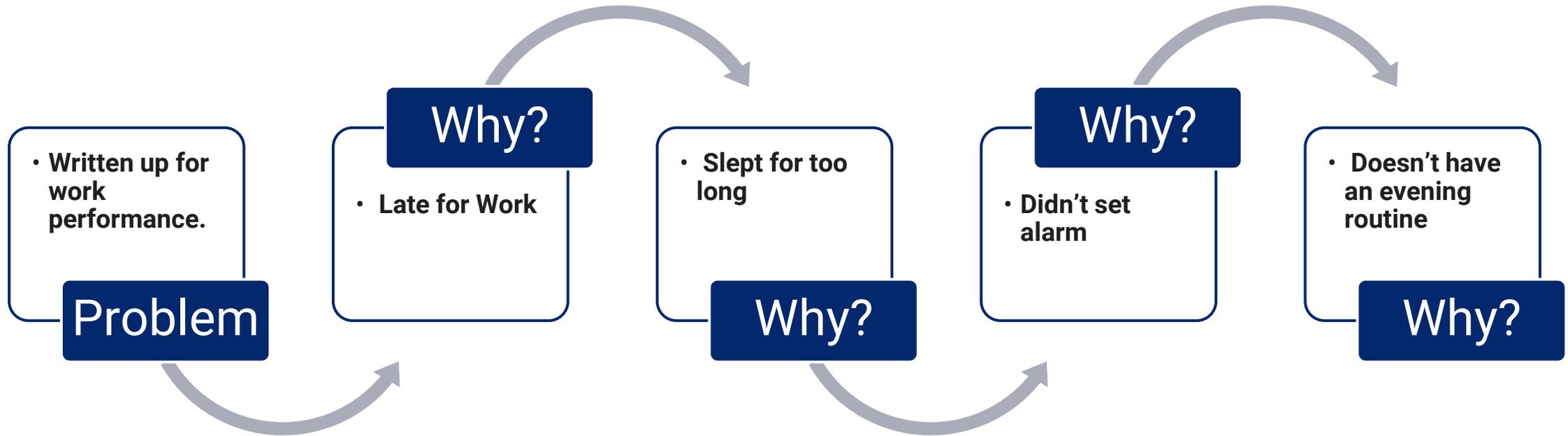
R.E.M. Cycle

- Root cause defines the underlying risk driver—not just the event trigger.
- If the identified cause changes or expands, the mitigation strategy must be reassessed to ensure it addresses that actual risk.
- Mitigation that does not directly correspond to the validated root cause will not reliably prevent recurrence.





Conceptual Foundations



Root cause analysis (RCA)—a collective term that describes a wide range of approaches, tools, and techniques used to uncover causes of problems.

The root cause (core issue) is the highest-level cause that sets in motion the cause-and-effect reaction that ultimately leads to the problem(s).

Why—Root Cause

To ensure the entire problem has been identified so remediation and mitigation activities can fully address all causes and prevent reoccurrence.





Root Cause

Problem

- Breaker was not restored to the correct position after maintenance

Why?

- Worker was in a rush to complete job

Why?

- They had to do maintenance on three other breakers before they could leave, and it was already after hours

Why?

- Sudden unexpected change in schedule

Why?

- Poor personnel planning by management

General Expectations and Guidelines

Report the noncompliance as quickly as possible and stop it from continuing or reoccurring

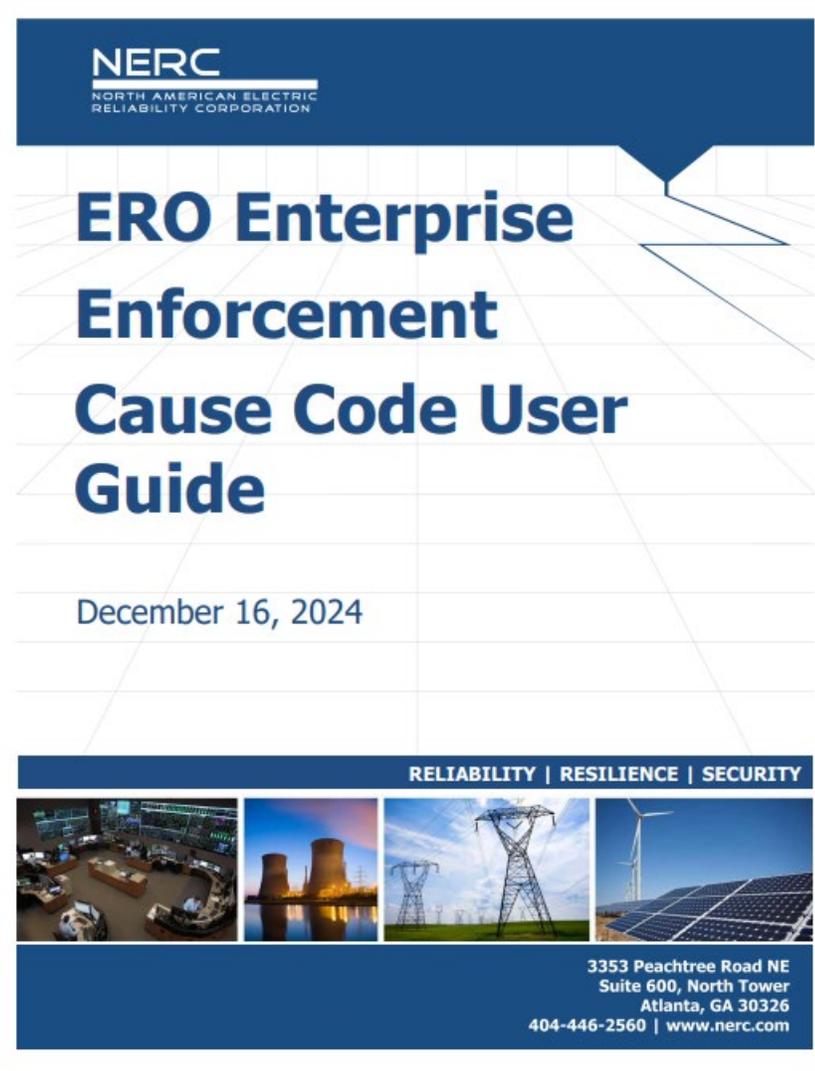


Perform a root cause analysis, but do not delay reporting to finish the root cause analysis



Submit additional root cause analysis details once available including the cause code

Enforcement Cause Codes



- Purpose of Enforcement Specific Cause codes:
- characterize the most used causes in the enforcement space
 - provide more consistency across the Regional Entities.
 - identification and analysis of trends

Concept Example

Root Cause

Concept Example

MILK-001

Application of concept to non-NERC situation





Root Cause

Original Causal Statement

Sunbear successfully determined what caused the milk to be expired.

Cause Analysis

Problem: Spoiled Milk

- Bacteria developed in the milk.

Why?

- Refrigerator unplugged by janitor for extended period causing unsafe temperatures.

Why?

- Refrigerator unplugged so it could be moved to clean floor.

Why?

- The refrigerators electric cord wasn't long enough.



Root Cause

Improved Causal Statement

- Primary- ENF-04 Design – Ineffective Process Flow or System Design or failure of system/technology
- Secondary- ENF-02 Communication/Coordination – Internal
- Sunbear determined the spoiled milk discovered on July 21, 2023, was the result of milk being stored at an unsafe temperature. An investigation determined its janitorial staff periodically unplugs this refrigerator to perform floor maintenance. An extended period without power coupled with high ambient temperatures in July caused the milk to spoil.
- The root cause of this instance was determined to be too short of an electrical cord and lack of training.
- Sunbear also discovered one gallon of milk that had exceeded the sell by date by greater than 14 days at a separate other location. Sunbear verified janitorial staff did not unplug the other refrigerators because their cord was long enough.
- The root cause of this instance was the employee in charge of Milk Monitoring was on sick leave, and the back up Milk Monitor was not informed of their absence.



Risk Assessment

What Is Risk?



**Registered Entity
Self-Report and
Mitigation Plan
User Guide**

October 15, 2024

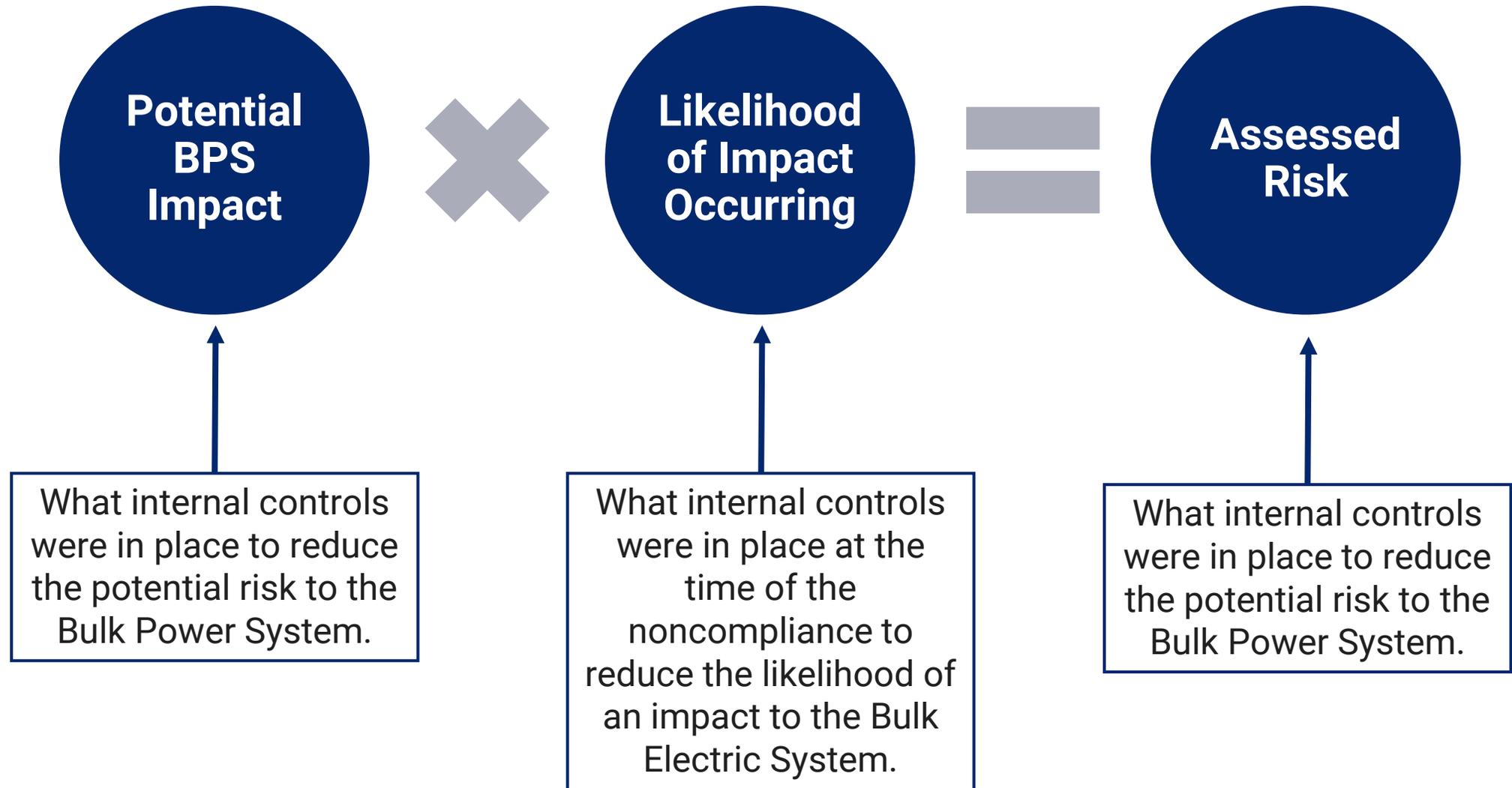
RELIABILITY | ACCOUNTABILITY



3353 Peachtree Road NE
Suite 600, North Tower
Atlanta, GA 30326
404-446-2560 | www.nerc.com

“Risk is the **potential impact** to reliability or security **multiplied by the likelihood of that impact occurring**. Risk assessment involves reviewing the negative consequence or the **potential impact** of the event and the **likelihood** that the event will occur, based on the **internal controls in place at the time the noncompliance** occurred as well as the inherent risk of the Registered Entity.”

Assessing Risk

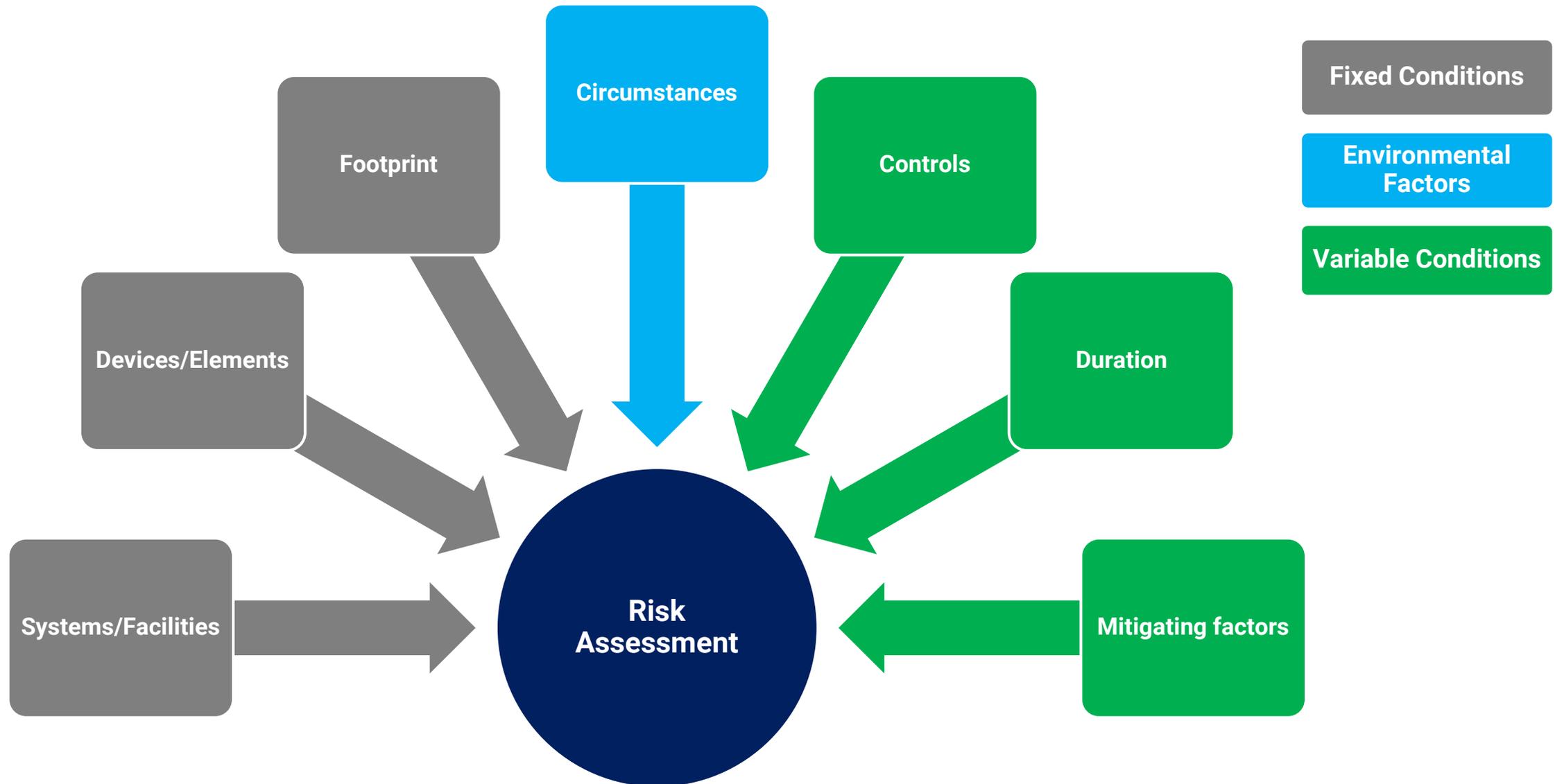


Two Types of Risk

- **Inherent risk** – The chance that an event could produce an unexpected outcome in the absence of any internal controls or risk mitigation efforts. This is determined by evaluating the assets or critical business processes at risk relative to the vulnerabilities and threats to those assets.
- **Residual risk** – The amount of risk remaining after controls and mitigation efforts are put in place. This is dependent on the controls' designs and effectiveness relative to the specific assets and inherent risk factors identified.



Inputs to the Noncompliance Risk Assessment





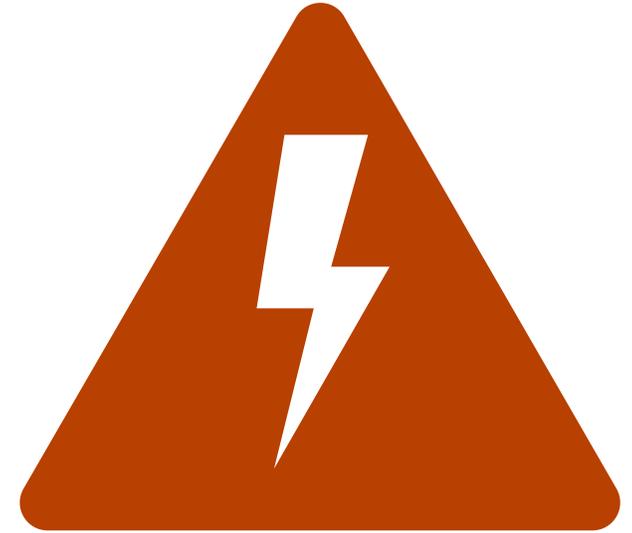
Controls and Levels of Potential Impact to the Bulk Power System



- Describe the policies and procedures engaged in preventing, detecting, and correcting the noncompliance.
- Provide details on why the noncompliance was not prevented. This can provide confidence of limited scope/duration.
- Some examples of risk controls to include:
 - A process for peer review
 - An automatic notification
 - Alerts for frequency and voltage
 - A checklist for generation startup
 - Internal audit programs

Assessing Risk

- Evaluate potential impact or harm that could have occurred.
- Determine the likelihood that the potential impact or harm could occur.
- Consider mitigating factors that would have reduced the likelihood of the potential impact or harm.
- Consider any internal controls that were in place at the time that expedited the discovery, shortened the duration, or reduced the severity of the impact of the noncompliance.



Concept Example

Risk Assessment

Concept Example

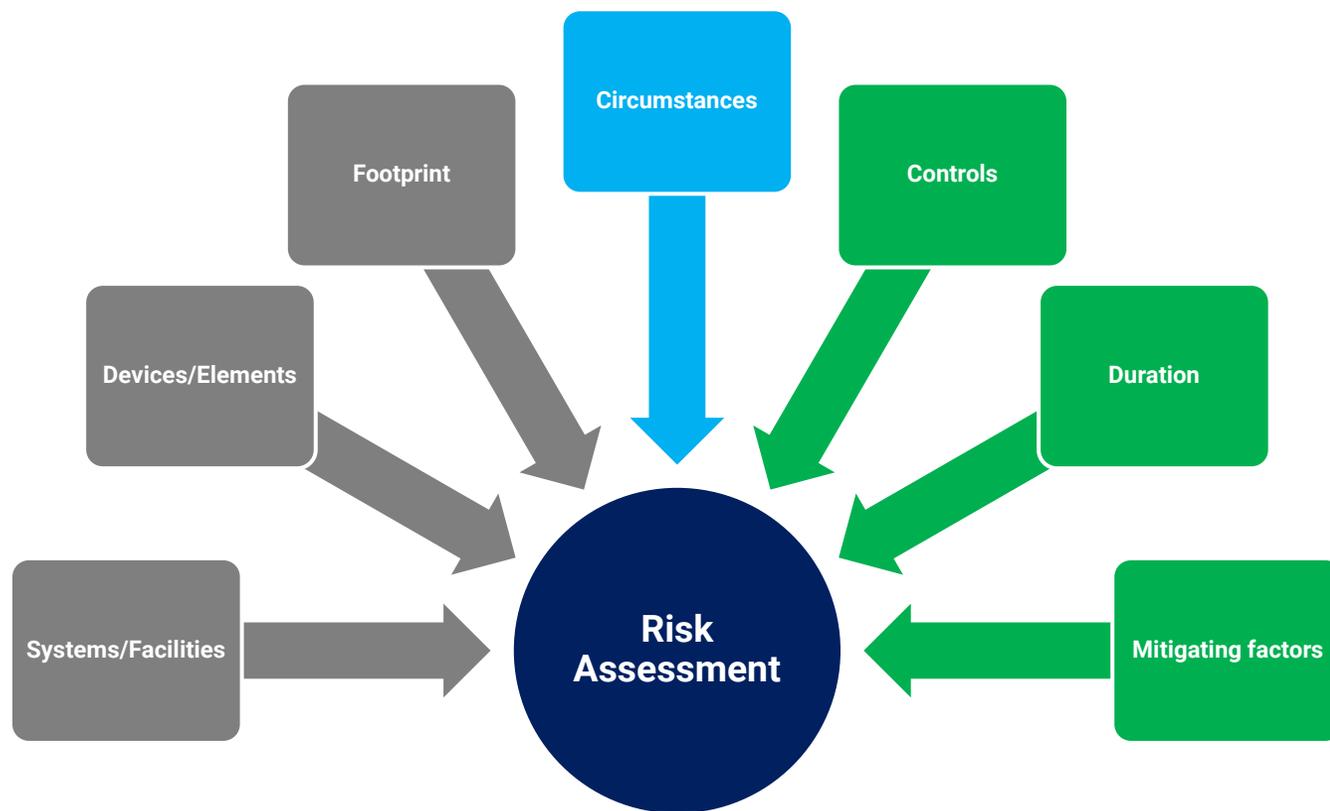
MILK-001

Apply the concept to non-NERC situation.





Concept Example—Original Risk Assessment



The risk is determined to be minimal because the milk in the small break room refrigerator is seldom used by Sunbear employees.

Concept Example—Improved Risk Assessment

Improved Risk Assessment

- **The risk is determined to be minimal.**
- Spoiled milk could potentially result in employees getting sick and impact operation resources. The resulting absences may cause fatigue for remaining staff, increasing the likelihood of human errors. Extended or wide-spread absences could also result in a failure to meet critical compliance filing deadlines.
- However, the risk of the violation was reduced due to the following factors:
 - Only 7% of Sunbear employees used the unplugged refrigerator for milk. Only 40% of all employees consume milk. No Sunbear employees were affected by this violation.
 - Employees have human detective controls to identify spoiled milk before consumption based on odor, consistency, and color. The spoiled milk was discovered early Monday morning after the refrigerator had been unplugged over the weekend.
 - Food safety standards allow up to two weeks of safe consumption past the “sell by” date when stored at safe temperatures. Milk with the “sell by” date in the past exceeded safety standard by only one day and exhibited no signs of spoilage.
 - Sunbear typically keeps its refrigerators at 33°F, 3°F below the temperature required to slow spoilage.



Mitigation

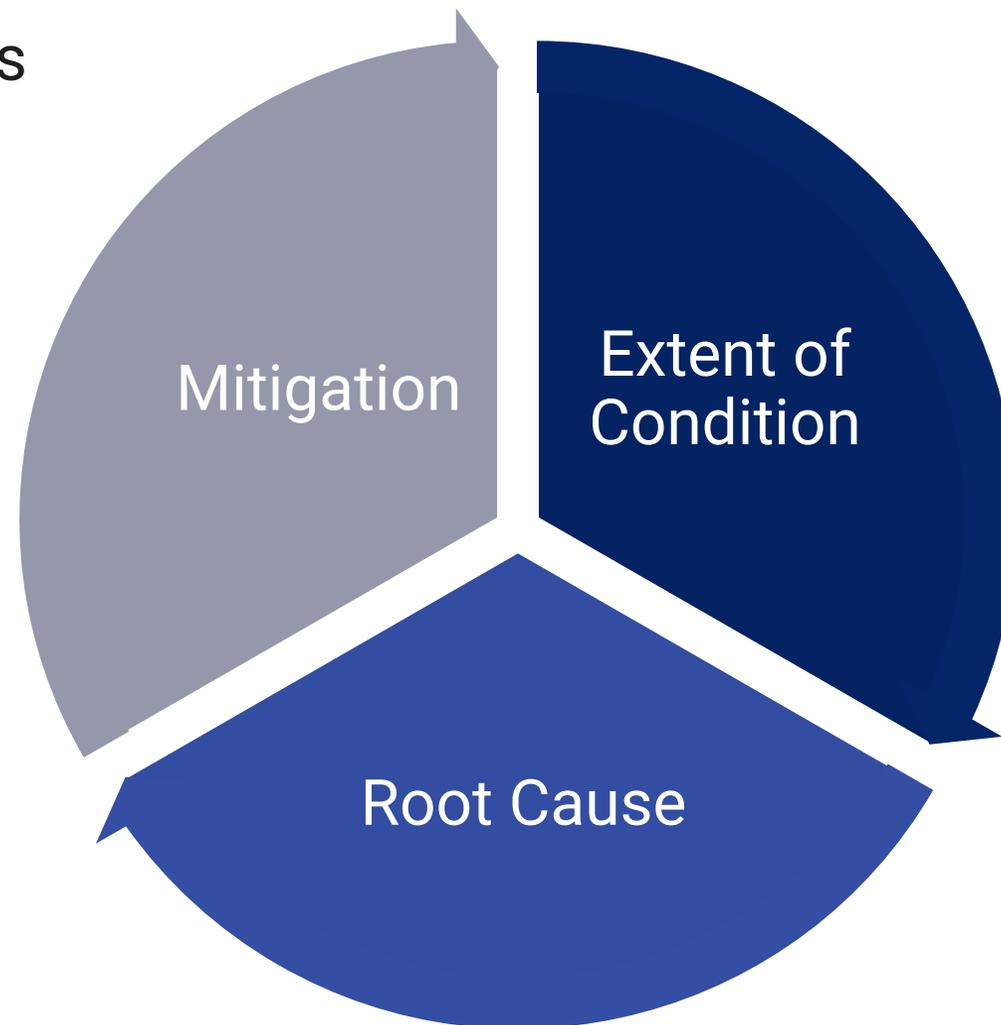
What is Mitigation?

Mitigation describes the action(s) taken by a Registered Entity to **correct and prevent** recurrence of a noncompliance



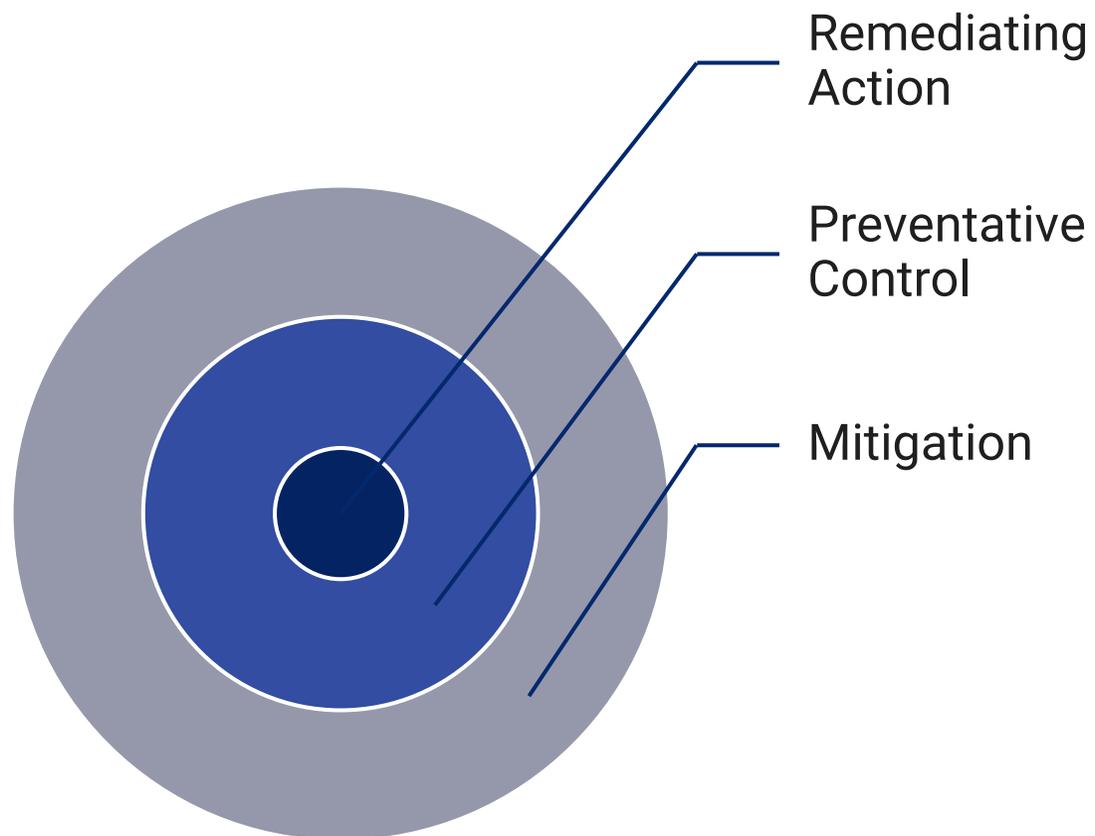
R.E.M. Cycle

- Effective mitigation must directly address both the validated root cause and the confirmed extent of condition.
- If either the cause or the scope of exposure changes, mitigation must be revised accordingly.
- Mitigation is complete only when it demonstrably reduces the identified reliability risk across the full affected population.





Remediation Action and Preventative control in Mitigation



- **Remediating Action** – Action(s) taken to return to compliance and must address the specific circumstances in the PNC.
- **Preventative Control** – What prevents recurrence based on the root cause. One action can address multiple root causes, but each identified root cause must be addressed.
- **Mitigation** – All actions taken by a Registered Entity to correct and prevent recurrence of a noncompliance



Types of Mitigating Activities



Remediating Action

An action taken to return to compliance for this PNC.

Corrective Control

A mechanism to mitigate damage once an operational risk event has occurred.

Preventative Control

A mechanism to keep errors or irregularities from occurring in the first place. At least one preventative control should address each cause identified.

Detective Control

An internal control designed to identify errors or deviations from the norm.

Other

Used for milestones that do not meet the criteria of any of the other types

Conceptual Examples



Remediating Action

1. Put the fire out



Corrective Control

1. Keep a fire extinguisher in the kitchen
2. Keep fire blanket under sink



Preventative Control

1. Set a timer on stove and phone
2. Remain in kitchen during all cooking



Detective Control

1. Smoke Detectors

Mitigating Plans vs Mitigating Activities



Activities

- Minimal & Moderate Risk
- Shorter completion time
- Functional milestones
- Default in Align



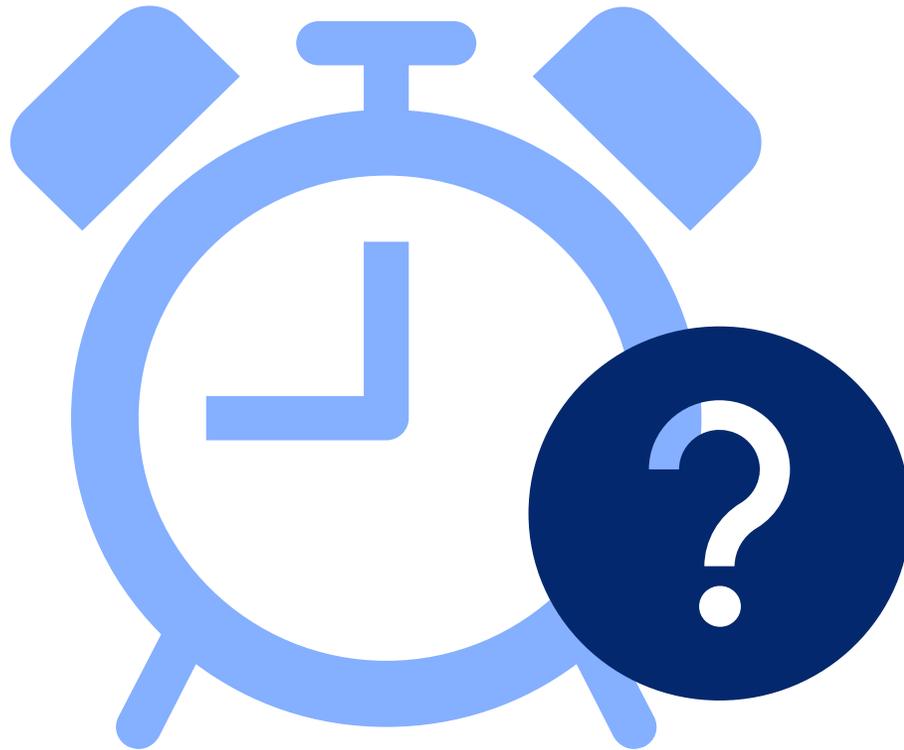
Plans

- Serious risk
- Complex mitigation
- Long Duration
- Milestones < 3 months apart
- *Requested by Regional Entity*

Risk to Bulk Power System



When to Perform Mitigation



- An entity should begin performing mitigation after a potential noncompliance is identified.
- An entity must submit Mitigating Activities to ensure the noncompliance is fully remediated and mitigated.

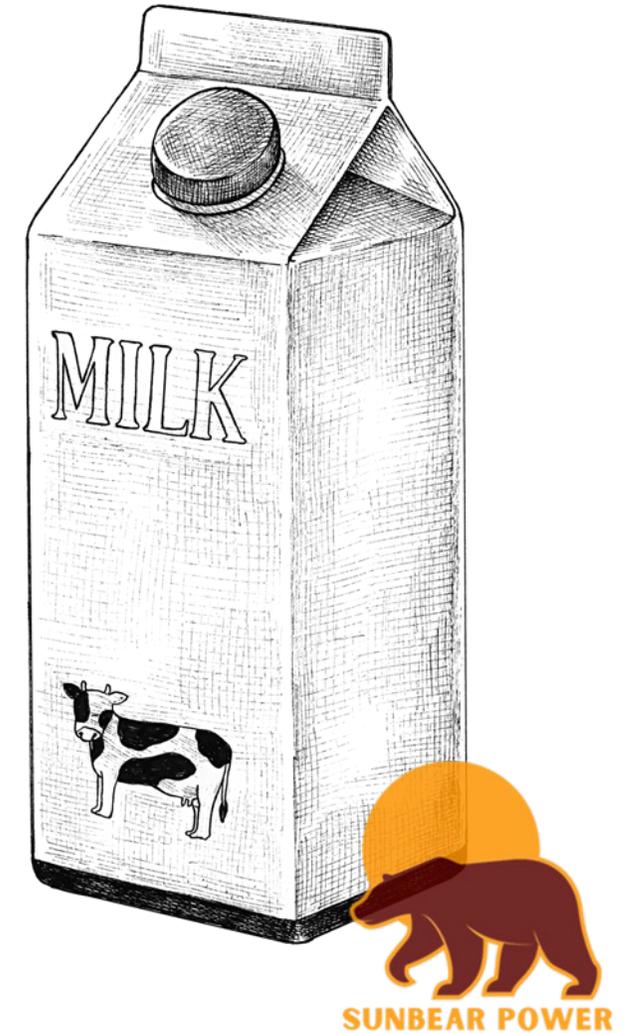
Concept Example

Duration of Noncompliance

Concept Example

MILK-001

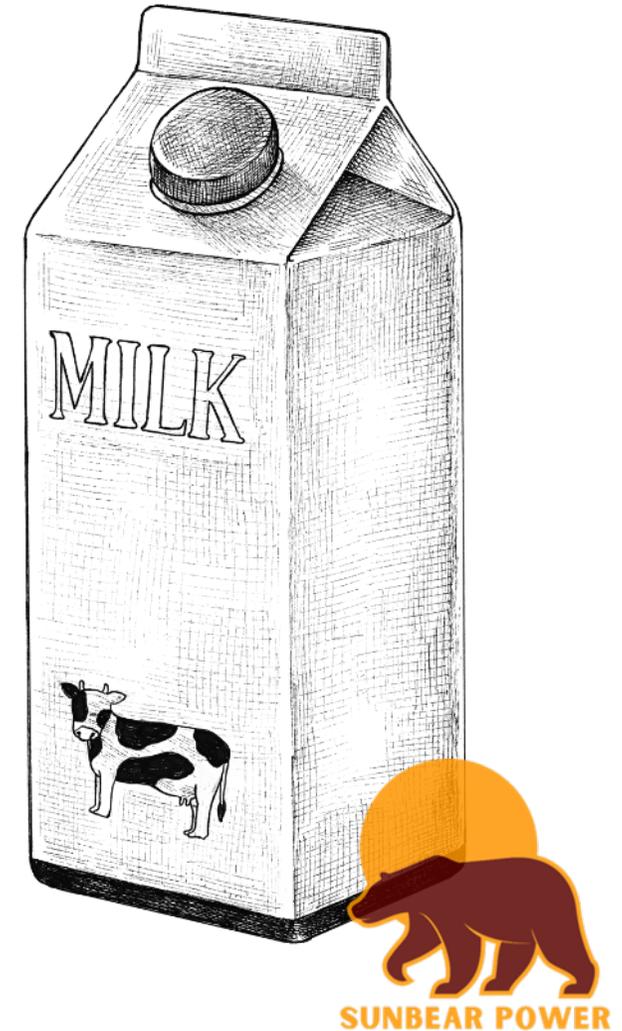
Application of concept to non-NERC situation



Mitigation

Original Mitigation Activities

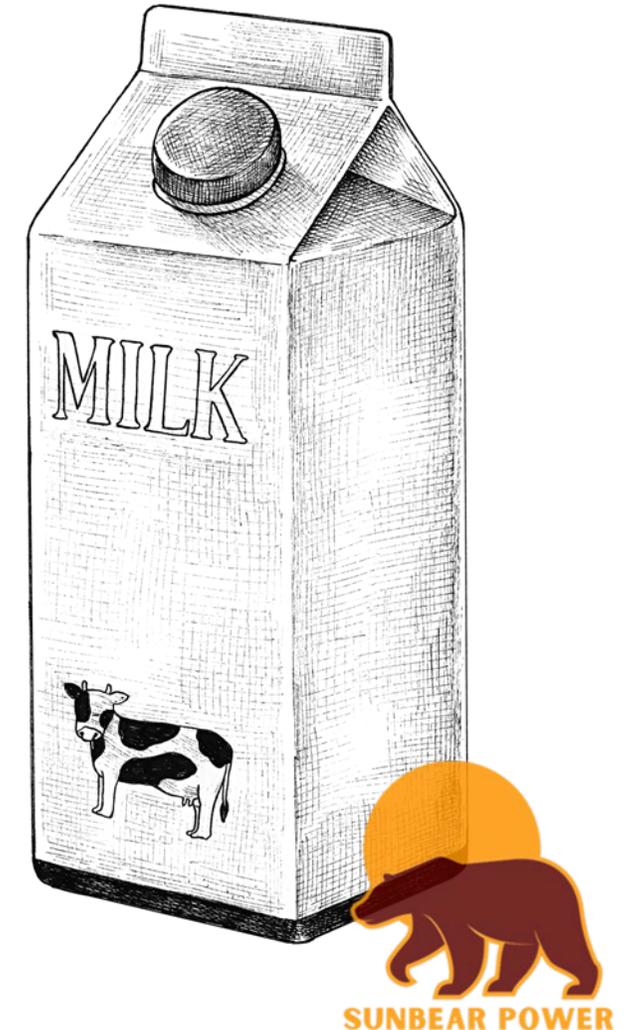
Remediating Activity: Sunbear's dispatch center manager will talk to the janitor who cleans the small break room at its dispatch center and tell him not to unplug the refrigerator anymore.



Mitigation

Improved Mitigation Activities

- **Remediating Activity:** Sunbear disposed of all expired milk.
- **Preventative Control:** Sunbear electricians installed a longer electrical cord on the refrigerator, so the janitor could move the refrigerator to clean without unplugging it.
- **Preventative Control:** Sunbear's dispatch center manager will talk to the janitor who cleans the small break room at its dispatch center and tell him not to unplug the refrigerator and let him know that a longer cord was installed.
- **Preventative Control:** the Milk Monitors manager will notify the alternate Milk Monitor if the primary Milk Monitor is unable to perform their responsibilities





Compliance History



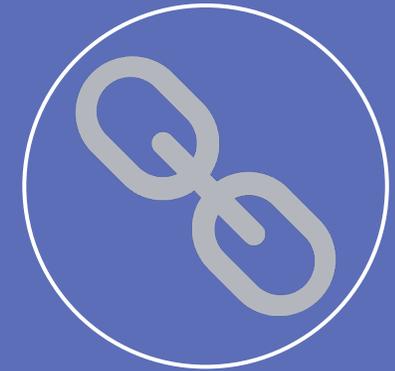
Conceptual Foundation



Five-Year
Noncompliance
Lookback



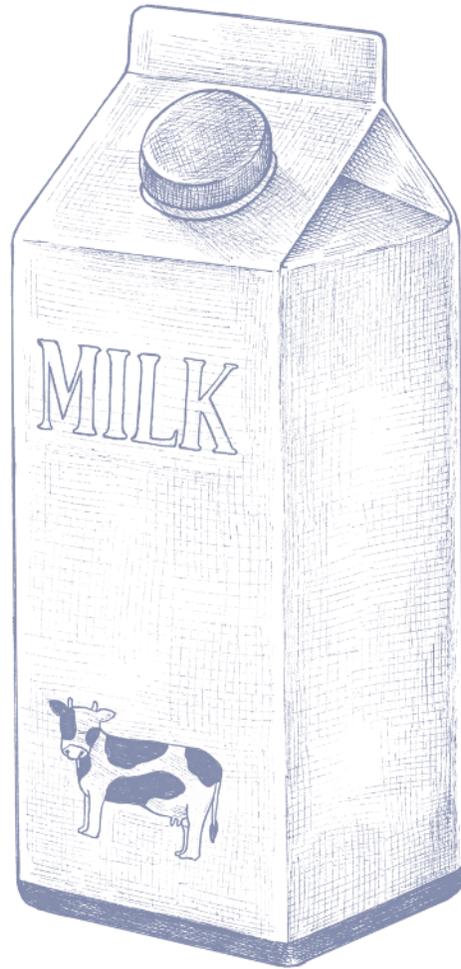
Noncompliance
with Same Root
Cause



Affiliates with
Same Violation



Compliance History



Operations Manual: MILK-001

Pasteurized Milk must be discarded before it has exceeded the sell by date by more than 14 days or undergone a noticeable negative change in smell, texture, color, or taste.

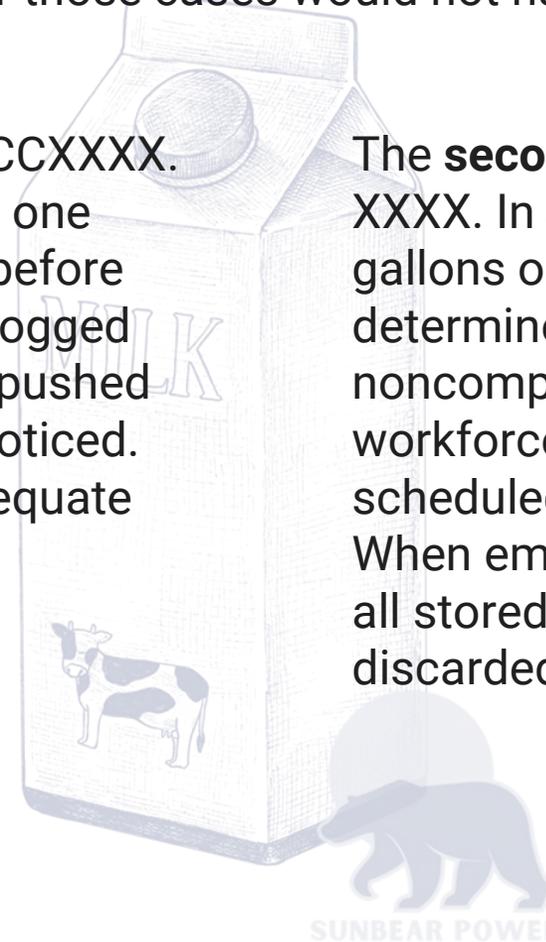


Fact Pattern

Sunbear has had two previous violations of MILK-001 in the past five years. However, the root causes were different, and mitigation for those cases would not have prevented the spoiled milk.

The **first instance** was filed under WECCXXXX. In September 2019, Sunbear identified one gallon of milk that was not discarded before its expiration date. Although Sunbear logged weekly milk inspections, the milk was pushed to the back of the fridge and went unnoticed. The root cause was assessed as inadequate training for refrigerator inspection.

The **second instance** was filed under 2020-XXXX. In June 2020, Sunbear discovered 10 gallons of expired milk. This incident was determined to be COVID-related noncompliance. Sunbear moved to a remote workforce model on a Tuesday before the scheduled Friday refrigerator inspection. When employees returned after six months, all stored milk was presumed spoiled and discarded based on expiration dates.



Compliance History Analysis



Sunbear has previously violated the same Standard and Requirement (MILK-001) within the five-year lookback period.

- Therefore, Sunbear has **relevant** compliance history.

Due to the different root causes for the two prior instances of noncompliance, the prior mitigations would not have prevented the current instance of noncompliance from occurring.

- Therefore, Sunbear does not have **aggravating** compliance history.

Compliance History

Analysis Explained

- WECC determined that the Entity's compliance history should not serve as a basis for elevating the disposition track for this noncompliance.
- The Entity previously committed two relevant violations of MILK-001.
- The first violation resulted from inadequate training on refrigerator inspection.
- The second violation was due to COVID-related noncompliance. Sunbear switched to remote work before the scheduled refrigerator inspection. After six months, employees returned and discarded all stored milk, assuming it was spoiled based on expiration dates.
- In this instance, the root cause was a short electrical cord and a lack of communication about the primary Milk Monitor's sick leave, leaving the backup uninformed. Previous mitigation measures would not have prevented or detected this noncompliance.

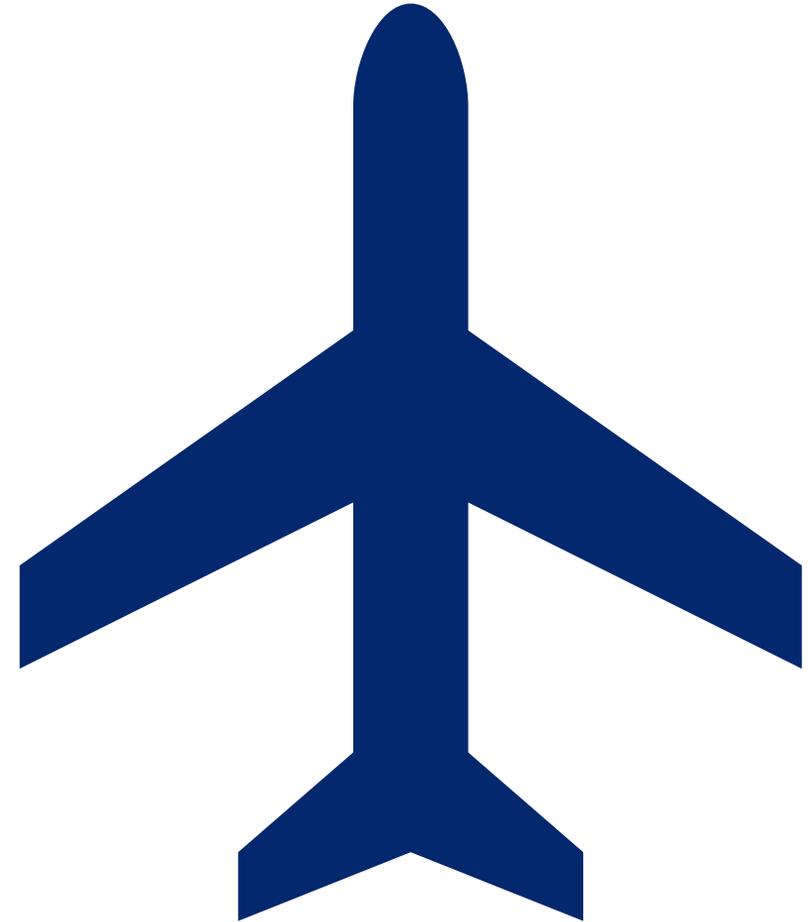




Summary Exercise – TVL-001

TVL-001

Submit all hotel and meal receipts to expense software for reimbursement within seven days of completing travel.

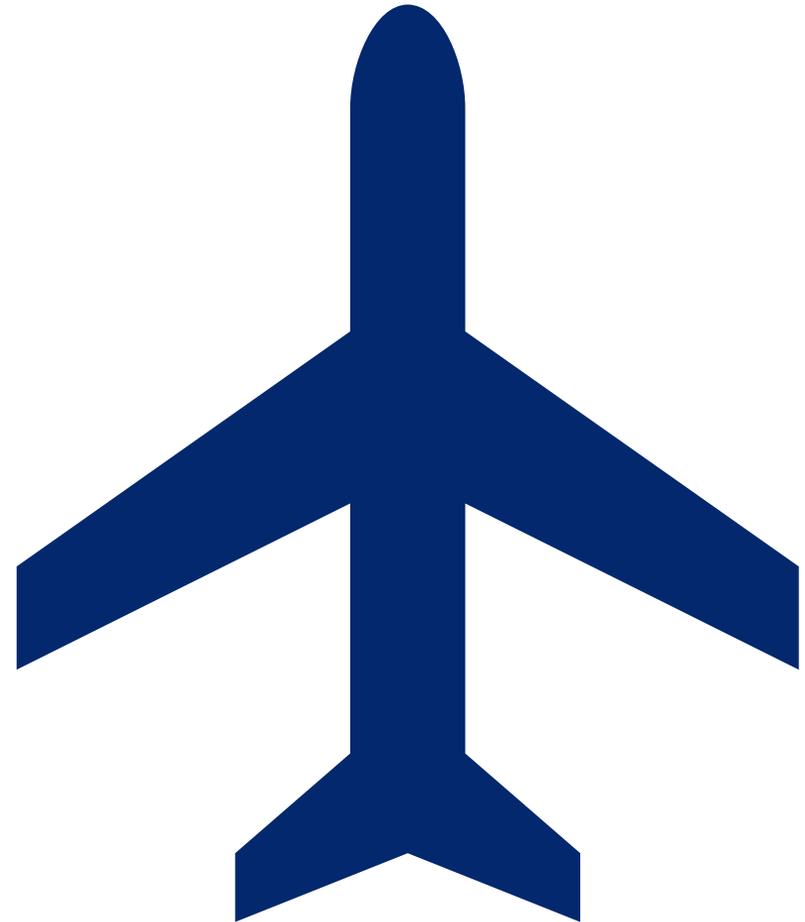




Summary Exercise - TVL-001

On January 15, 2026, when you went to book your plane ticket to highly anticipated and well regarded WECC Reliability & Security Workshop, you realized you never submitted an expense from last years workshop.

If you want to submit and expense, you will need to self-report.





Self Report for TVL-001

Description of Noncompliance

- I went to a conference and forgot my receipts.

Extent of Condition

- All of them.

Duration

- During the trip

Risk to BES

- None

Root Cause

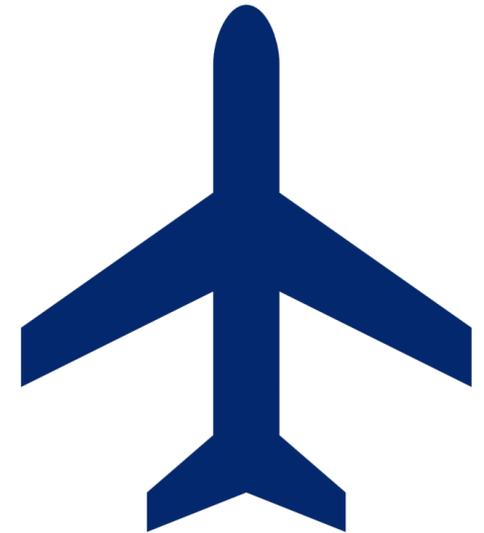
- Paper receipts get lost.

Mitigation

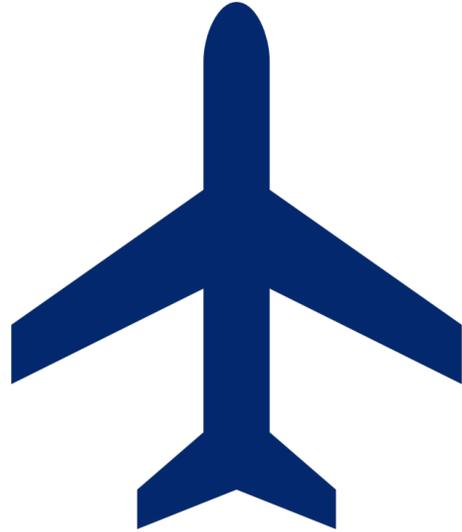
- I turned in the receipt;
- Next R&S Workshop is in fall.

Compliance History

- I've never lost *all* my receipts before.



Self Report for TVL-001



Description of Noncompliance

- I attended WECC Reliability and Security Workshop from October 14–15, 2025 in San Diego, CA.

Extent of Condition

- Unable to locate receipts for air, hotel, dining and transportation.
- Confirmed all other 2025 expenses were submitted in a timely manner.

Duration

- All missing receipts were for expenses incurred from October 13-16, 2026.

Risk to BES

- The risk to the BPS was minimal. When receipts are not submitted, the expense is absorbed by employee.

Root Cause

- Inadequate procedure to prompt submittal of receipts.
- My sandwich bag of receipts was seized by TSA for evidence in a personal matter.

Mitigation

- Receipts submitted through mobile application.
- Next R&S Workshop is in fall.

Compliance History

- I've never lost *all* my receipts before.

Summary Exercise – FAC-001

FAC-001

R2. Each applicable Generator Owner, **within 45 days of executing an Agreement** to evaluate the reliability impact of interconnecting *another Facility to its existing generation Facility* (under FAC-002-1), **shall document and publish and** thereafter maintain **Facility connection requirements** to ensure compliance with NERC Reliability Standards and applicable Regional Entity, subregional, Power Pool, and individual Transmission Owner planning criteria and Facility connection requirements.





Summary Exercise – FAC-001

During a recent audit, auditors discovered a failure to publish your entity's newest facility connection requirements document, and as a result the auditors have found your organization noncompliant with the FAC-001 standard.

What now?



Self Report for FAC-001



Description of Noncompliance

- During a WECC compliance audit, WECC auditors discovered a discrepancy between the latest facility connections requirements documents provided to auditors and the entities published interconnection requirements. After the audit, it was determined that due to a website update, newer versions of interconnection requirements were no longer being updated on the public website.

Extent of Condition

- The analysis was performed in a timely manner in October 2025, however it was not published within 45 days due to a problem in the interface between our webservices and report server. The previous requirement documentation from April 2024 is still available to generators.

Duration

- The new study was completed on December 1, 2025, so the new study must be published by January 14, 2026. The new study was published today March 18, 2026, for a duration of 107 days.

Risk to BES

- The risk to the BPS was minimal. The revised analysis contained no required modifications to system settings or impacts to performance dynamics.

Root Cause

- Sunbear lacked an internal control / procedure to verify the availability of documentations of publication. A contributing cause were changes in the company's public facing webpage's publishing protocols, which applied erroneous security provisions to some internal resources.

Mitigation

- Preventative Control: Implement new internal procedure to include webmaster in distribution of new interconnection reports.
- Detective Control: A workflow step was added to verify publication of documentation on public webpage within 14 days of publishing step.

Compliance History

- There is no history of previous violations.



Questions?



**Reliability & Security
Workshop**

WECC

**Take our
survey!**





WICF Meeting

Thursday, March 19

Breakfast 7:30–8:30 a.m. PDT

Meeting 8:30 a.m.–12:15 p.m. PDT

Lunch 12:15 –1:45 p.m. PDT

Meeting 1:45–3:25 p.m. PDT



ENGAGE WITH WECC





www.wecc.org | 801-582-0353



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