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Texas Regional Entity (Texas RE) is Now Hiring

Texas RE is currently looking for well qualified Compliance Engineers. To view a list of our current openings please go to the ERCOT Career Center, search "Compliance" and select the Austin, Tx location.

[Visit the ERCOT Career Center.](#)

Upcoming Events

ERCOT's 25th Annual Operations Training Seminar

[Find more information on the seminar and registration.](#)

Texas Regional Entity's Standards and Compliance Workshops

May 6th and September 23rd

Texas Regional Entity's Critical Infrastructure Protection (CIP) Workshop

September 24th

Texas RE News

Texas Regional Entity Portal Launch

On December 31, 2008, Texas Regional Entity (Texas RE) introduced its portal: <https://portal.texasre.org> Many aspects of the NERC Compliance Monitoring and Enforcement Program and NERC registrations will be conducted through the Texas Regional Entity Portal. With the portal's launch, Texas RE looks forward to improved administration, increased security, and simpler tracking of compliance submissions.

Each NERC-registered entity has been assigned a Master Account Administrator (MAA), typically the organization's Primary Compliance Contact (PCC). The MAA is responsible for keeping the organization's NERC Compliance Registry information, contact records, and security permissions up-to-date. Each MAA will update the contact information on the portal for the organization's PCC, Authorized Entity Officer, and CEO.

For compliance submissions, the portal offers electronic forms that may be filled out, saved, signed, and submitted to Texas RE. These submissions will be completed by each organization's designated contributors, viewers, and signatories, all through the portal. (Continued on Page 2).


Texas Regional Entity Portal Launch (Continued)

The focus of the portal launch has been on the self-certification process. Self-certifications on Critical Infrastructure Protection (CIP) cyber security standards CIP-002-1 through CIP-009-1 are required to be submitted (for applicable functions) through the portal by January 31.

Additional forms for self-certifications and other compliance submissions will become available on the portal throughout 2009. For each new capability that is introduced, Texas RE will notify the NERC-registered entities and make training available.

Find the Texas Regional Entity Portal: portal.texasre.org. Note: In order for you to access the portal, your organization must be a NERC-registered entity, and you must have a contact record enabled for your organization's Master Account. Contact your MAA, your PCC, or, if you do not know either, information@texasre.org.

- You will need to register separately with the LMS to access training.
- Find training documents on how to submit self-certifications via the portal, retrieve a new password, and change a password, as well as FAQs: www.texasre.org (under Portal Training).
- Email questions about the portal: information@texasre.org

Portal Home TexasRE.org																							
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<p>Logged in as: Clark Kent</p> <p style="text-align: right;">▶ Log Out</p> <p>▶ System Administration</p> <p>▶ Compliance</p>	<table border="1" style="width: 100%;"> <tr> <th colspan="2" style="text-align: center;">Announcements</th> </tr> <tr> <td style="vertical-align: top;"> <p>Welcome to the Texas Regional Entity Portal 12/31/2008</p> <p>The Texas Regional Entity Portal is the vehicle through which many aspects of the NERC Compliance Monitoring and Enforcement Program and NERC registrations are conducted. The portal allows improved administration, increased security, and simpler tracking.</p> <p>Reminder: Please keep the portal secure. Each user must have an individual portal account. Do not share your account or password with others.</p> <p>How to print a form 12/31/2008</p> <p>Download copies of any electronic forms filed on the Texas Regional Entity Portal by following these instructions: (1) open a browser window (Internet Explorer); select File, then Page Setup; select Landscape (lower left-hand corner); and click Print button. You will be able to print to either PDF or a printer.</p> </td> <td style="vertical-align: top;"> <table border="1" style="width: 100%;"> <tr> <th colspan="2" style="text-align: center;">Compliance Summary</th> </tr> <tr> <th colspan="2" style="text-align: center;">Critical Infrastructure Protection</th> </tr> <tr> <th style="text-align: left;">Form Name</th> <th style="text-align: left;">Due Date</th> </tr> <tr> <td>CIP 002-009 TOP-Not Req</td> <td>1/31/2009</td> </tr> <tr> <td>CIP 002-009 TOP-Other</td> <td>1/31/2009</td> </tr> <tr> <td>CIP 002-009 TOP/SCC</td> <td>1/31/2009</td> </tr> <tr> <td>CIP 002-009 TSP</td> <td>1/31/2009</td> </tr> </table> </td> </tr> <tr> <th colspan="2" style="text-align: center;">Legal Notice</th> </tr> <tr> <td colspan="2"> <p>Each organization's Master Account Administrator is responsible for ensuring that NERC Compliance Registry information and Texas Regional Entity Portal contact records are current.</p> <p>Through use of this portal, your organization certifies the following:</p> <ul style="list-style-type: none"> ○ Master Account contact persons are current and authorized employees or contractors of your organization. ○ Portal information is up-to-date. ○ Contact roles, including that of Authorized Signatory, are appropriately assigned and used per the Texas RE Compliance Monitoring and Enforcement Program. </td> </tr> </table>	Announcements		<p>Welcome to the Texas Regional Entity Portal 12/31/2008</p> <p>The Texas Regional Entity Portal is the vehicle through which many aspects of the NERC Compliance Monitoring and Enforcement Program and NERC registrations are conducted. The portal allows improved administration, increased security, and simpler tracking.</p> <p>Reminder: Please keep the portal secure. Each user must have an individual portal account. Do not share your account or password with others.</p> <p>How to print a form 12/31/2008</p> <p>Download copies of any electronic forms filed on the Texas Regional Entity Portal by following these instructions: (1) open a browser window (Internet Explorer); select File, then Page Setup; select Landscape (lower left-hand corner); and click Print button. You will be able to print to either PDF or a printer.</p>	<table border="1" style="width: 100%;"> <tr> <th colspan="2" style="text-align: center;">Compliance Summary</th> </tr> <tr> <th colspan="2" style="text-align: center;">Critical Infrastructure Protection</th> </tr> <tr> <th style="text-align: left;">Form Name</th> <th style="text-align: left;">Due Date</th> </tr> <tr> <td>CIP 002-009 TOP-Not Req</td> <td>1/31/2009</td> </tr> <tr> <td>CIP 002-009 TOP-Other</td> <td>1/31/2009</td> </tr> <tr> <td>CIP 002-009 TOP/SCC</td> <td>1/31/2009</td> </tr> <tr> <td>CIP 002-009 TSP</td> <td>1/31/2009</td> </tr> </table>	Compliance Summary		Critical Infrastructure Protection		Form Name	Due Date	CIP 002-009 TOP-Not Req	1/31/2009	CIP 002-009 TOP-Other	1/31/2009	CIP 002-009 TOP/SCC	1/31/2009	CIP 002-009 TSP	1/31/2009	Legal Notice		<p>Each organization's Master Account Administrator is responsible for ensuring that NERC Compliance Registry information and Texas Regional Entity Portal contact records are current.</p> <p>Through use of this portal, your organization certifies the following:</p> <ul style="list-style-type: none"> ○ Master Account contact persons are current and authorized employees or contractors of your organization. ○ Portal information is up-to-date. ○ Contact roles, including that of Authorized Signatory, are appropriately assigned and used per the Texas RE Compliance Monitoring and Enforcement Program. 	
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Snapshot Taken from
Texas RE Portal

Texas RE's Primary Goal is to Maintain Reliability of the Bulk Power System.

Maintaining a Vigorous Compliance Program

Texas RE's primary goal is to maintain reliability of the Bulk Power System. Robust compliance programs minimize the potential for violations of NERC Reliability Standards and ERCOT Protocols and Operating Guides and thus strengthen system reliability. Successful implementation of quality compliance programs is critical to achieving compliance with NERC Reliability Standards, ERCOT Protocols, and by registered entities Operating Guides.

As FERC notes in its October 16, 2008 Policy Statement on Compliance (125 FERC ¶ 61,058), the following key factors should be addressed in a quality compliance program:

- (1) Endorsement by senior management: The best program will not succeed unless senior management actively embraces the importance of compliance and sets the standard within a company for proactive compliant behavior. Senior management should communicate its commitment to compliance frequently, both formally and informally, to employees.
- (2) Effective preventive measures: A company should implement their compliance program with effective accountability for compliance and periodic reviews and evaluations of the program. A comprehensive internal monitoring system and actively-promoted company hotline should aid in prompt detection of potential issues.
- (3) Prompt detection, cessation, and reporting of any violation: An organization should be able to demonstrate its diligence in discovering and promptly correcting and reporting any potential violation. As noted in the FERC Statement on Compliance and NERC's Sanctions Guidelines (Appendix 4B to the NERC Rules of Procedure), registered entities may receive credit (in the determination of penalties and sanctions) for diligently and promptly detecting, correcting, and reporting any potential NERC standard violations.
- (4) Remediation: If a violation occurs, a company should promptly prepare a mitigation plan that details a plan and timeline for promptly correcting the non-compliance, or, if the non-compliance has already been corrected, detailing how and when the non-compliance was corrected. The company should promptly submit the mitigation plan to Texas RE for acceptance or comments, because an accepted mitigation plan can stop the continuation of daily penalties.

[View Policy Statement on Compliance.](#)

Bulk Power System v. Bulk Electric System – What’s the Difference?

Perhaps many of you wonder about the scope of facilities under Texas RE’s purview. Is it the Bulk Power System (BPS) or the Bulk Electric System (BES)? What’s the difference? The short answer is that FERC has established the BPS as being under the purview of NERC and the Regional Entities. However, most NERC reliability standards still apply to the BES, depending on the circumstances. BPS is a broader term which includes but is not limited to the BES and is expected to eventually be the standard. In this article we explain what each term means, when they apply, and what we expect in the future to aid in your compliance efforts.

Table 1. Detailed Relationship Between BPS and BES

	BES	BPS
Distribution: Below 69 kV		
Transmission: 69 kV – 100kV		X
Transmission: 100 kV & higher	X	X
Generation Radial Transmission	X	X
“Load Only” Radial Transmission		X
Generation	X	X
Associated Control Systems & Equipment	X	X
Energy		X

Table 1 and Figure 1 illustrate the relationship between the BPS and BES. We’ll begin with a discussion of BES. Currently, NERC states that Reliability Standards apply to the BES (exceptions apply as noted later). NERC’s definition of BES, technically a term of art, is as follows: “As defined by the Regional Reliability Organization, the electrical generation resources, transmission lines, interconnections with neighboring systems, and associated equipment, generally operated at voltages of 100 kV or higher. Radial transmission facilities serving only load with one transmission source are generally not included in this definition.”

Notice that the NERC definition of BES delegates the definition to the Regional Reliability Organization. In the ERCOT Region, the definition is unchanged from the NERC definition. Also note the definition applies to infrastructure at voltages of 100 kV and higher. It also excludes radial transmission serving only load, and it excludes energy.

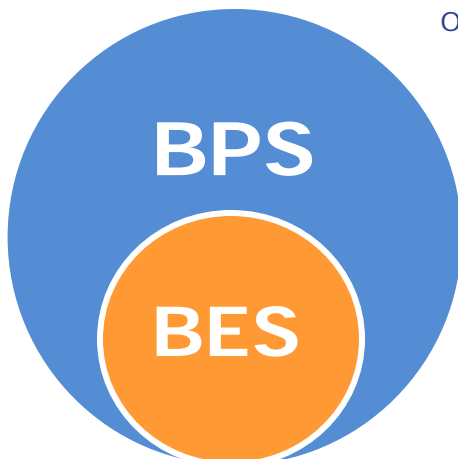


Figure 1. Relationship Between BPS and BES

On the other hand, BPS, is a term defined in Section 215 of the Federal Power Act as follows:

- (A) Facilities and control systems necessary for operating an interconnected electric energy transmission network (or any portion thereof) and (B) electric energy from generating facilities needed to maintain transmission system reliability. The term does not include facilities used in the local distribution of electric energy.”

Notice that this is a very broad definition. It includes the entire bulk power infrastructure, including control systems and energy. No reference is made to a voltage level other than it excludes distribution facilities. So it includes 69 kV and higher voltages.

FERC Orders 693 and 693-A speak to the applicability of these definitions. Without delving into unwieldy complexity, FERC states in Order 693-A that until they deem differently, and unless NERC and the Regional Reliability Organizations deems otherwise, NERC’s definition, BES, defines the facilities to which reliability standards apply. (Continued on page 5).

Bulk Power System v. Bulk Electric System – What’s the Difference? (Continued)

Be advised that exceptions apply and you'll have to consult specific standards to be certain. FAC-003-1, Vegetation Management, for example, applies to facilities 200 kV and higher or facilities deemed critical. Also PRC-0011-0, UVLS System Maintenance and Testing, applies to Distribution Providers that own undervoltage load shedding systems. In addition, if you are going through a Hearing Process, the two terms may be used interchangeably – meaning BPS applies.

2009 Audit Schedule

Texas RE has forty-six audits scheduled in 2009. Our schedule includes the name of entities being audited, dates the audits will take place and the type of audit being conducted.

[View the Texas RE Audit Schedule.](#)

Mitigation Plan Completion

Texas RE appreciates the entities cooperation in the completion of mitigation plans. When a mitigation plan is complete, the entity should submit a letter certifying that the mitigation plan is complete. This letter should be on company letterhead and include the date of completion, as well, as a signature by a company office or authorized representative of the registered entity. The registered entity should provide this documentation to Texas RE as soon as the mitigation plan is completed. Data or documentation sufficient for Texas RE to verify completion should also be sent to Texas RE.

[Email Texas RE at mitigation@texasre.org.](mailto:mitigation@texasre.org)

Please submit feedback, comments, and suggestions to information@texasre.org or contact Lindley Ellisor at (512) 225-7022. If you are receiving e-mail from a distribution list from which you no longer wish to receive communications, please follow this link in order to unsubscribe from this list: <http://lists.ercot.com>. All external links within this newsletter are provided for your convenience. Maintenance is not the responsibility of Texas RE.