

SER Evidence Retention Recommendations

Action

Endorse the recommendations below made by the Standards Efficiency Review sub-team in its Evidence Retention white-paper.

Summary

The SER evidence retention sub-team simplified the existing evidence retention schemes. The recommended set of five evidence retention schemes covers all NERC Operations & Planning and Critical Infrastructure Protection (CIP) Reliability Standards and requirements as shown in the following table.

Recommended Data/Evidence Retention Schemes	Rationale for the Data/Evidence Retention Scheme
<p>1. Current plan, model, agreement, methodology, study, program or procedure with a revision history specifying changes and dates of review. If revised within the last year, the prior version should also be retained.</p>	<p>This satisfies the need for auditors to see the most recent documentation in a variety of areas. What is most important is the current document and that document should have a revision history showing that it is regularly reviewed and updated. In some instances, evidence retention may exceed a three year period.</p>
<p>2. Most recent full testing records with evidence of previous testing intervals.</p>	<p>This satisfies the requirements to complete and document various tests and includes the requirement to have evidence of the previous full testing records. In some instances, evidence retention may exceed a three-year period.</p>
<p>3. Rolling 3 Months data retention period.</p>	<p>Data retention schemes that require significant computer storage, such as voice and audio recordings, could be reduced to 3 months of rolling history.</p>
<p>4. Rolling 12 Months data retention period.</p>	<p>This satisfies existing evidence retention scheme requirements that have at least 12 months of data. Based on the type of data or reliability risk, it may not be necessary to retain 36 months of data.</p>
<p>5. Rolling 36 Months data retention period.</p>	<p>Many existing evidence retention schemes call for a three-year (36-month) retention schedule. The 36-month data retention is retained with the addition of “rolling”.</p>

Recommended Actions

The SER Phase 2 team Data/Evidence Retention Project team recommends the following actions:

1. Consider Rules of Procedure (ROP) changes for evidence retention to minimize administrative burden. (NERC staff)

2. Retire [Compliance Bulletin #2011-001 Data Retention Requirements](#), once ROP changes are in effect or publish CMEP guidance to supersede the bulletin. (ERO Enterprise staff and CCC)
3. Concurrent to ROP changes, update standard drafting teams (SDTs) references and notify active SDTs, with the minimum options for risk-based data retention schemes, as described above. In addition, the headings within Reliability Standard should be consistently named “Data and Evidence Retention Period”. (Standards Committee (SC))
4. If desired, concurrent with ROP changes, establish a project to revise evidence retention schemes for enforceable Reliability Standards with a standard drafting team, Periodic Review team, or other mechanism. (SC, CCC, and NERC staff)
5. Ensure changes to CMEP evidence retention processes are made in associated documents and communicated with ERO Enterprise staff, such as NERC Auditor’s Manual, training materials, etc. (NERC staff)
6. Ensure final recommendations of SER Evidence Retention are circulated with the CCC, SC, and NERC staff, and recommendations are incorporated into respective work plans in 2020. (CCC, SC, NERC staff)