

# Reliability Standard Audit Worksheet<sup>1</sup>

# **TOP-001-3 – Transmission Operations**

This section to be completed by the Compliance Enforcement Authority.

Audit ID: Audit ID if available; or REG-NCRnnnnn-YYYYMMDD

**Registered Entity:** Registered name of entity being audited

NCR Number: NCRnnnnn

Compliance Enforcement Authority: Region or NERC performing audit
Compliance Assessment Date(s)<sup>2</sup>: Month DD, YYYY, to Month DD, YYYY

Compliance Monitoring Method: [On-site Audit | Off-site Audit | Spot Check]

Names of Auditors: Supplied by CEA

# Applicability of Requirements

	ВА	DP	GO	GOP	IA	LSE	PA	PSE	RC	RP	RSG	ТО	ТОР	TP	TSP
R1													Χ		
R2	Х														
R3	Χ	Х		Χ											
R4	Х	Χ		Х											
R5		Х		Χ									Χ		
R6		Χ		Х									Χ		
<b>R7</b>	Χ												Χ		
R8															

<sup>1</sup> NERC developed this Reliability Standard Audit Worksheet (RSAW) language in order to facilitate NERC's and the Regional Entities' assessment of a registered entity's compliance with this Reliability Standard. The NERC RSAW language is written to specific versions of each NERC Reliability Standard. Entities using this RSAW should choose the version of the RSAW applicable to the Reliability Standard being assessed. While the information included in this RSAW provides some of the methodology that NERC has elected to use to assess compliance with the requirements of the Reliability Standard, this document should not be treated as a substitute for the Reliability Standard or viewed as additional Reliability Standard requirements. In all cases, the Regional Entity should rely on the language contained in the Reliability Standard itself, and not on the language contained in this RSAW, to determine compliance with the Reliability Standard. NERC's Reliability Standards can be found on NERC's website. Additionally, NERC Reliability Standards are updated frequently, and this RSAW may not necessarily be updated with the same frequency. Therefore, it is imperative that entities treat this RSAW as a reference document only, and not as a substitute or replacement for the Reliability Standard. It is the responsibility of the registered entity to verify its compliance with the latest approved version of the Reliability Standards, by the applicable governmental authority, relevant to its registration status.

The NERC RSAW language contained within this document provides a non-exclusive list, for informational purposes only, of examples of the types of evidence a registered entity may produce or may be asked to produce to demonstrate compliance with the Reliability Standard. A registered entity's adherence to the examples contained within this RSAW does not necessarily constitute compliance with the applicable Reliability Standard, and NERC and the Regional Entity using this RSAW reserves the right to request additional evidence from the registered entity that is not included in this RSAW. Additionally, this RSAW includes excerpts from FERC Orders and other regulatory references. The FERC Order cites are provided for ease of reference only, and this document does not necessarily include all applicable Order provisions. In the event of a discrepancy between FERC Orders, and the language included in this document, FERC Orders shall prevail.

<sup>&</sup>lt;sup>2</sup> Compliance Assessment Date(s): The date(s) the actual compliance assessment (on-site audit, off-site spot check, etc.) occurs.

	ВА	DP	GO	GOP	IA	LSE	PA	PSE	RC	RP	RSG	то	ТОР	TP	TSP
R9	Х												Χ		
R10													Χ		
R11	Χ														
R12													Χ		
R13													Χ		
R14													Χ		
R15													Χ		
R16													Χ		
R17	Χ														
R18	Χ												Χ		
R19													Χ		
R20	Χ														

# Legend:

Text with blue background:	Fixed text – do not edit
Text entry area with Green background:	Entity-supplied information
Text entry area with white background:	Auditor-supplied information

# **Findings**

(This section to be completed by the Compliance Enforcement Authority)

Finding	Summary and Documentation	<b>Functions Monitored</b>
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	Areas of Concern	
	Recommendations	
	Finding	Finding Summary and Documentation  Areas of Concern  Recommendations

Req.	Positive Observations

# **Subject Matter Experts**

Identify the Subject Matter Expert(s) responsible for this Reliability Standard.

Registered Entity Response (Required; Insert additional rows if needed):

SME Name	Title	Organization	Requirement(s)

# **R1 Supporting Evidence and Documentation**

- **R1.** Each Transmission Operator shall act to maintain the reliability of its Transmission Operator Area via its own actions or by issuing Operating Instructions.
- M1. Each Transmission Operator shall have and provide evidence which may include but is not limited to dated operator logs, dated records, dated and time-stamped voice recordings or dated transcripts of voice recordings, electronic communications, or equivalent documentation, that will be used to determine that it acted to maintain the reliability of its Transmission Operator Area via its own actions or by issuing Operating Instructions.

# **Compliance Narrative (Required):**

Provide a brief explanation, in your own words, of how you comply with this Requirement. References to
supplied evidence, including links to the appropriate page, are recommended.

# Evidence Requested<sup>i</sup>:

# Provide the following evidence, or other evidence to demonstrate compliance.

Evidence, which may include but is not limited to, operator logs, dated records, dated and time-stamped voice recordings or dated transcripts of voice recordings, electronic communications, or equivalent documentation that the Transmission Operator acted, or issued Operating Instructions, to address reliability within its Area.

# Registered Entity Evidence (Required):

The following information is requested for each document submitted as evidence. Also, evidence submitted should be highlighted and bookmarked, as appropriate, to identify the exact location where evidence of compliance may be found.

File Name	Document Title	Revision or Version	Document Date	Relevant Page(s) or Section(s)	Description of Applicability of Document

Audit Team Evidence Reviewed (This section to be completed by the Compliance Enforcement Authority):							

#### Compliance Assessment Approach Specific to TOP-001-3, R1

This section to be completed by the Compliance Enforcement Authority

(R1) For a sample of BES events selected by the auditor, review evidence and verify the entity acted, or

issued Operating Instructions, to maintain the reliability of its Transmission Operator Area.

**Note to Auditor:** Auditors are advised to monitor compliance with Requirement R1 during events, due to the importance of issuing Operating Instructions in such instances. Auditors can obtain a population of events for sampling from NERC's, or the Regional Entity's, records of mandatory event reports, other information available at the Regional Entities, or a query of the entity. Auditors are encouraged to monitor compliance during the most critical events on the entity's system occurring during the compliance monitoring period.

**Auditor Notes:** 

# **R2 Supporting Evidence and Documentation**

- **R2.** Each Balancing Authority shall act to maintain the reliability of its Balancing Authority Area via its own actions or by issuing Operating Instructions.
- M2. Each Balancing Authority shall have and provide evidence which may include but is not limited to dated operator logs, dated records, dated and time-stamped voice recordings or dated transcripts of voice recordings, electronic communications, or equivalent documentation, that will be used to determine that it acted to maintain the reliability of its Balancing Authority Area via its own actions or by issuing Operating Instructions

Provide a brief explanation,	in your own words	, of how you	comply with	n this Requirement	. References to
supplied evidence, including	g links to the appro	priate page, a	re recomm	ended.	

# Evidence Requested i:

# Provide the following evidence, or other evidence to demonstrate compliance.

Evidence which may include but is not limited to dated operator logs, dated records, dated and time-stamped voice recordings or dated transcripts of voice recordings, electronic communications, or equivalent documentation, that the entity acted, or issued Operating Instructions, to address reliability within its Reliability Coordinator Area.

# **Registered Entity Evidence (Required):**

The following information is requested for each document submitted as evidence. Also, evidence submitted should be highlighted and bookmarked, as appropriate, to identify the exact location where evidence of compliance may be found.

File Name	Document Title	Revision or Version	Document Date	Relevant Page(s) or Section(s)	Description of Applicability of Document

Audit Team Evidence Reviewed (This section to be completed by the Compliance Enforcement Authority):					

Compliance Assessment Approach Specific to TOP-001-3, R2

This section to be completed by the Compliance Enforcement Authority

(R2) For a sample of BES events selected by the auditor, review evidence and verify the entity acted, or issued Operating Instructions to maintain the reliability of its Balancing Authority Area.

**Note to Auditor:** Auditors are advised to monitor compliance with Requirement R2 during events, due to the importance of issuing Operating Instructions in such instances. Auditors can obtain a population of events for sampling from NERC's, or the Regional Entity's, records of mandatory event reports, other information available at the Regional Entities, or a query of the entity. Auditors are encouraged to monitor compliance during the most critical events on the entity's system occurring during the compliance monitoring period.

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Auditor Notes

# R3 Supporting Evidence and Documentation

- **R3.** Each Balancing Authority, Generator Operator, and Distribution Provider shall comply with each Operating Instruction issued by its Transmission Operator(s), unless such action cannot be physically implemented or it would violate safety, equipment, regulatory, or statutory requirements.
- M3. Each Balancing Authority, Generator Operator, and Distribution Provider shall make available upon request, evidence that it complied with each Operating Instruction issued by the Transmission Operator(s) unless such action could not be physically implemented or it would have violated safety, equipment, regulatory, or statutory requirements. Such evidence could include but is not limited to dated operator logs, voice recordings or transcripts of voice recordings, electronic communications, or other equivalent evidence in electronic or hard copy format. In such cases, the Balancing Authority, Generator Operator, Distribution Provider, and Load-Serving Entity shall have and provide copies of the safety, equipment, regulatory, or statutory requirements as evidence for not complying with the Transmission Operator's Operating Instruction. If such a situation has not occurred, the Balancing Authority, Generator Operator, Distribution Provider, or Load-Serving Entity may provide an attestation.

# Registered Entity Response (Required):

<b>Question:</b> Did the entity receive an Operating instruction from a Transmission Operator during the
compliance monitoring period?
☐ Yes ☐ No
If No, state how this was ascertained. If yes, provide a list of instances of receiving Operating Instructions from
a TOP and evidence to demonstrate compliance.
[Note: A separate spreadsheet or other document may be used. If so, provide the document reference below.]

## **Compliance Narrative (Required):**

Provide a brief explanation, in your own words, of how you comply with this Requirement. References to supplied evidence, including links to the appropriate page, are recommended.

#### **Evidence Requested:**

# Provide the following evidence, or other evidence to demonstrate compliance.

Evidence which could include but is not limited to dated operator logs, voice recordings or transcripts of voice recordings, electronic communications, or other equivalent evidence in electronic or hard copy format showing that entity complied with each Operating Instruction issued by its Transmission Operator(s), unless such action could not be physically implemented or would have violated safety, equipment, regulatory, or statutory requirements.

#### Registered Entity Evidence (Required):

The following information is requested for each document submitted as evidence. Also, evidence submitted should be highlighted and bookmarked, as appropriate, to identify the exact location where evidence of compliance may be found.

File Name	Document Title	Revision or Version	Document Date	Relevant Page(s) or Section(s)	Description of Applicability of Document
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Audit Team Evidence Reviewed (This section to be completed by the Compliance Enforcement Authority):
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Audit Team Evidence Reviewed (This section to be completed by the Compliance Enforcement Authority):
Compliance Assessment Approach Specific to TOP-001-3, R3
This section to be completed by the Compliance Enforcement Authority
(R3) For all, or a sample of, BES events selected by the auditor, review evidence and verify the entity
complied with Operating Instructions issued by its Transmission Operator(s) unless such action could
not be physically implemented or it would have violated safety equipment, regulatory, or statutory
requirements.
<b>Note to Auditor:</b> Auditors are advised to monitor compliance with Requirement R3 during events, due to
the importance of complying with Operating Instructions in such instances. Auditors can obtain a
population of events for sampling from NERC's, or the Regional Entity's, records of mandatory event
reports, other information available at the Regional Entities, or a query of the entity. Auditors are
encouraged to monitor compliance during the most critical events on the entity's system occurring during
the compliance monitoring period.
Auditor Notes:

# **R4 Supporting Evidence and Documentation**

- **R4.** Each Balancing Authority, Generator Operator, and Distribution Provider shall inform its Transmission Operator of its inability to comply with an Operating Instruction issued by its Transmission Operator.
- M4. Each Balancing Authority, Generator Operator, and Distribution Provider shall make available upon request, evidence which may include but is not limited to dated operator logs, voice recordings or transcripts of voice recordings, electronic communications, or equivalent evidence in electronic or hard copy format, that it informed its Transmission Operator of its inability to comply with its Operating Instruction issued. If such a situation has not occurred, the Balancing Authority, Generator Operator, or Distribution Provider may provide an attestation.

Registered Entity Response (Required):
Question: Did the entity receive an Operating Instruction from a Transmission Operator where compliance
with the Operating Instruction could not be physically implemented or such actions would violate safety,
equipment, regulatory, or statutory requirements during the compliance monitoring period?
☐ Yes ☐ No
If No, state how this was ascertained. If yes, provide a list of instances of receiving Operating Instructions from
a Transmission Operator that could not be implemented and evidence of compliance with Requirement R4.
[Note: A separate spreadsheet or other document may be used. If so, provide the document reference below.]
Compliance Narrative (Required):
Provide a brief explanation, in your own words, of how you comply with this Requirement. References to
supplied evidence, including links to the appropriate page, are recommended.

# Evidence Requested i:

# Provide the following evidence, or other evidence to demonstrate compliance.

Evidence which could include but is not limited to dated operator logs, voice recordings or transcripts of voice recordings, electronic communications, or other equivalent evidence in electronic or hard copy format showing that the entity informed its Transmission Operator of its inability to comply with its Operating Instruction.

#### **Registered Entity Evidence (Required):**

The following information is requested for each document submitted as evidence. Also, evidence submitted should be highlighted and bookmarked, as appropriate, to identify the exact location where evidence of compliance may be found.

Revision

Revision

		Revision			
		or	Document	Relevant	Description of Applicability
File Name	<b>Document Title</b>	Version	Date	Page(s)	of Document
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Auc	lit Team Evidence Re	eviewed (This section	n to be com	oleted by the	Compliance	Enforcement Authority):
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No the po rej en	(R4) If the entity was Transmission Operate to Auditor: Auditorian English Transmission Operate to Auditorian Compulation of events for corts, other information	vas unable to comply rator(s). tors are advised to n plying with Operatir or sampling from NE tion available at the r compliance during	y with the Op nonitor comp ng Instruction RC's, or the R Regional Ent	ment Author erating Instru- pliance with R is in such inst egional Entit	equirement ances. Audi y's, records or the en	R4 during events, due to

# **R5 Supporting Evidence and Documentation**

- **R5.** Each Transmission Operator, Generator Operator, and Distribution Provider shall comply with each Operating Instruction issued by its Balancing Authority, unless such action cannot be physically implemented or it would violate safety, equipment, regulatory, or statutory requirements.
- M5. Each Transmission Operator, Generator Operator, and Distribution Provider shall make available upon request, evidence that it complied with each Operating Instruction issued by the Balancing Authority(s) unless such action could not be physically implemented or it would have violated safety, equipment, regulatory, or statutory requirements. Such evidence could include but is not limited to dated operator logs, voice recordings or transcripts of voice recordings, electronic communications, or other equivalent evidence in electronic or hard copy format. In such cases, the Transmission Operator, Generator Operator, and Distribution Provider shall have and provide copies of the safety, equipment, regulatory, or statutory requirements as evidence for not complying with the Balancing Authority's Operating Instruction. If such a situation has not occurred, the Transmission Operator, Generator Operator, or Distribution Provider may provide an attestation.

Registered	<b>Entity</b>	Response	(Rea	uired'	١:
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Question: Did the entity receive an Operating Instruction from the Balancing Authority during the compliance
monitoring period?
☐ Yes ☐ No
If No, state how this was ascertained. If yes, provide a list of instances of receiving Operating Instructions from the Balancing Authority and evidence to demonstrate compliance.
[Note: A separate spreadsheet or other document may be used. If so, provide the document reference below.]
Compliance Narrative (Required):
Provide a brief explanation, in your own words, of how you comply with this Requirement. References to supplied evidence, including links to the appropriate page, are recommended.

# Evidence Requested i:

Provide the following evidence, or other evidence to demonstrate compliance.

Evidence which could include but is not limited to dated operator logs, voice recordings or transcripts of voice recordings, electronic communications, or other equivalent evidence in electronic or hard copy format showing that the entity complied with each Operating Instruction issued by its Balancing Authority.

# Registered Entity Evidence (Required):

The following information is requested for each document submitted as evidence. Also, evidence submitted should be highlighted and bookmarked, as appropriate, to identify the exact location where evidence of compliance may be found.

File Name	Document Title	Revision or Version	Document Date	Relevant Page(s) or Section(s)	Description of Applicability of Document		
Audit Team Evidence Reviewed (This section to be completed by the Compliance Enforcement Authority):							
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# Compliance Assessment Approach Specific to TOP-001-3, R5

This section to be completed by the Compliance Enforcement Authority

(R5) For a sample of BES events selected by the auditor, review evidence and verify the entity complied with Operating Instructions issued by its Balancing Authority unless such action could not be physically implemented or it would have violated safety equipment, regulatory, or statutory requirements.

**Note to Auditor:** Auditors are advised to monitor compliance with Requirement R5 during events, due to the importance of complying with Operating Instructions in such instances. Auditors can obtain a population of events for sampling from NERC's, or the Regional Entity's, records of mandatory event reports, other information available at the Regional Entities, or a query of the entity. Auditors are encouraged to monitor compliance during the most critical events on the entity's system occurring during the compliance monitoring period

<b>Auditor Notes:</b>			

# **R6 Supporting Evidence and Documentation**

- **R6.** Each Transmission Operator, Generator Operator, and Distribution Provider shall inform its Balancing Authority of its inability to comply with an Operating Instruction issued by that Balancing Authority.
- **M6.** Each Transmission Operator, Generator Operator, and Distribution Provider shall make available upon request, evidence which may include but is not limited to dated operator logs, voice recordings or transcripts of voice recordings, electronic communications, or equivalent evidence in electronic or hard copy format, that it informed its Balancing Authority of its inability to comply with its Operating Instruction. If such a situation has not occurred, the Transmission Operator, Generator Operator, or Distribution Provider may provide an attestation.

	Registered Entity	y Response	(Requi	ired)	:
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<b>Question:</b> Did the entity receive an Operating Instruction from the Balancing Authority where compliance with the Operating Instruction could not be physically implemented or such actions would have violated
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safety, equipment, regulatory, or statutory requirements during the compliance monitoring period?
☐ Yes ☐ No
If No, state how this was ascertained. If yes, provide a list of instances of receiving Operating Instructions from
the Balancing Authority that could not be implemented and evidence of compliance with Requirement R6.
[Note: A separate spreadsheet or other document may be used. If so, provide the document reference below.]
[Note: A separate spreadsheet or other document may be used. It so, provide the document reference below.]
Compliance Narrative (Required):
Provide a brief explanation, in your own words, of how you comply with this Requirement. References to
supplied evidence, including links to the appropriate page, are recommended.

# Evidence Requested i:

# Provide the following evidence, or other evidence to demonstrate compliance.

Evidence which could include but is not limited to dated operator logs, voice recordings or transcripts of voice recordings, electronic communications, or other equivalent evidence in electronic or hard copy format showing that an entity informed its Balancing Authority of its inability to comply with its Operating Instruction, if the entity was unable to comply with the Operating Instruction.

#### **Registered Entity Evidence (Required):**

The following information is requested for each document submitted as evidence. Also, evidence submitted should be highlighted and bookmarked, as appropriate, to identify the exact location where evidence of compliance may be found.

Revision

or

Document

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	(R6) If the entity wa	as unable to comply	with the Ope	erating Instru	ctions, deter	mine if it informed the
		as unable to comply y that it couldn't cor	·	erating Instru	ctions, deter	mine if it informed the
	Balancing Authority	y that it couldn't cor	nply.			mine if it informed the R6 during events, due to
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# **R7 Supporting Evidence and Documentation**

- **R7.** Each Transmission Operator shall assist other Transmission Operators within its Reliability Coordinator Area, if requested and able, provided that the requesting Transmission Operator has implemented its comparable Emergency procedures, unless such assistance cannot be physically implemented or would violate safety, equipment, regulatory, or statutory requirements.
- M7. Each Transmission Operator shall make available upon request, evidence that comparable requested assistance, if able, was provided to other Transmission Operators within its Reliability Coordinator Area unless such assistance could not be physically implemented or would have violated safety, equipment, regulatory, or statutory requirements. Such evidence could include but is not limited to dated operator logs, voice recordings or transcripts of voice recordings, electronic communications, or other equivalent evidence in electronic or hard copy format. If no request for assistance was received, the Transmission Operator may provide an attestation.

Registered	d Entity	Response	(Requ	ired	<b>)</b> :
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<b>Question:</b> Did the entity receive a request to provide assistance to another Transmission Operator during the
compliance monitoring period?
☐ Yes ☐ No
If No, state how this was ascertained. If yes, provide a list such requests and state if the assistance was provided. If assistance was not provided, state the reasons such assistance was not provided. [Note: A separate spreadsheet or other document may be used. If so, provide the document reference below.]
Compliance Narrative (Required):
Provide a brief explanation, in your own words, of how you comply with this Requirement. References to supplied evidence, including links to the appropriate page, are recommended.

#### Evidence Requested i:

Provide the following evidence, or other evidence to demonstrate compliance.

Dated operator logs, voice records (or transcripts), electronic communications, or other equivalent evidence in electronic or hard copy format. If no request for assistance was received, an attestation may be provided.

#### Registered Entity Evidence (Required):

The following information is requested for each document submitted as evidence. Also, evidence submitted should be highlighted and bookmarked, as appropriate, to identify the exact location where evidence of compliance may be found.

Revision

		Revision			
		or	Document	Relevant	Description of Applicability
File Name	Document Title	Version	Date	Page(s)	of Document

				or Section(s)	
Audit Team Eviden	ce Reviewed (T	nis section to be co	mpleted by the	: Compliance	Enforcement Authority):
This section to be of (R7) For all a	completed by the sample of BES e		cement Author le auditor, revie	ew evidence	and verify the entity with Requirement R7.
Note to Auditor: Athe importance of events for samplir information availa	Auditors are adv Transmission Ong from NERC's, Ible at the Regions the most critical	ised to monitor con perator assistance i or the Regional Enti	npliance with Rongler on such instance ty's records of ery of the entit	equirement es. Auditors mandatory y. Auditors a	R7 during events, due to can obtain a population of event reports, other re encouraged to monitor
Auditor Notes:					

# **R8 Supporting Evidence and Documentation**

- **R8.** Each Transmission Operator shall inform its Reliability Coordinator, known impacted Balancing Authorities, and known impacted Transmission Operators of its actual or expected operations that result in, or could result in, an Emergency.
- M8. Each Transmission Operator shall make available upon request, evidence that it informed its Reliability Coordinator, known impacted Balancing Authorities, and known impacted Transmission Operators of its actual or expected operations that result in, or could result in, an Emergency. Such evidence could include but is not limited to dated operator logs, voice recordings or transcripts of voice recordings, electronic communications, or other equivalent evidence. If no such situations have occurred, the Transmission Operator may provide an attestation.

Registered	d Entity	Response	(Requ	ired	<b>)</b> :
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Registered Entity Response (Required):
Question: Did the entity encounter any expected operations that could have resulted in an Emergency, or that
did result in an actual Emergency, during the compliance monitoring period?
☐ Yes ☐ No
If No, explain how this was ascertained. If Yes, provide a list of such instances and evidence of compliance.
[Note: A separate spreadsheet or other document may be used. If so, provide the document reference
below.]
Compliance Narrative (Required):
Provide a brief explanation, in your own words, of how you comply with this Requirement. References to
supplied evidence, including links to the appropriate page, are recommended.

#### Evidence Requested ::

# Provide the following evidence, or other evidence to demonstrate compliance.

Documentary evidence (such as outlined in M8) to support that the entity informed its Reliability Coordinator, known impacted Balancing Authorities, and known impacted Transmission Operators of the actual or expected operations that result in, or could result in, an Emergency.

#### Registered Entity Evidence (Required):

The following information is requested for each document submitted as evidence. Also, evidence submitted should be highlighted and bookmarked, as appropriate, to identify the exact location where evidence of compliance may be found.

				Relevant	
		Revision		Page(s)	
		or	Document	or	Description of Applicability
File Name	Document Title	Version	Date	Section(s)	of Document

# Audit Team Evidence Reviewed (This section to be completed by the Compliance Enforcement Authority):

# Compliance Assessment Approach Specific to TOP-001-3, R8

This section to be completed by the Compliance Enforcement Authority

(R8) Obtain a list of dates and times that the entity experienced operational conditions that could or did result in an Emergency.

(R8) For all or a sample of Emergencies, review documentary evidence to determine if the entity informed its Reliability Coordinator, known impacted Balancing Authorities, and known impacted Transmission Operators of the actual or expected operations that could result in, or did result in, an Emergency.

**Note to Auditor:** 

Auditor Notes:			

# **R9 Supporting Evidence and Documentation**

- **R9.** Each Balancing Authority and Transmission Operator shall notify its Reliability Coordinator and known impacted interconnected entities of all planned outages, and unplanned outages of 30 minutes or more, for telemetering and control equipment, monitoring and assessment capabilities, and associated communication channels between the affected entities.
- M9. Each Balancing Authority and Transmission Operator shall make available upon request, evidence that it notified its Reliability Coordinator and known impacted interconnected entities of all planned outages, and unplanned outages of 30 minutes or more, for telemetering and control equipment, monitoring and assessment capabilities, and associated communication channels. Such evidence could include but is not limited to dated operator logs, voice recordings or transcripts of voice recordings, electronic communications, or other equivalent evidence. If such a situation has not occurred, the Balancing Authority or Transmission Operator may provide an attestation.

# **Compliance Narrative (Required):**

Provide a brief explanation, in your own words, of how you comply with this Requ	uirement. R	eferences to
supplied evidence, including links to the appropriate page, are recommended.		

# Evidence Requested i:

Provide the following evidence, or other evidence to demonstrate compliance.

A list of outages affecting other entities as described in Requirement R9.

Documentary evidence (such as outlined in Measure M9) that demonstrates that the entity notified its Reliability Coordinator and impacted interconnected entities of planned outages of telemetering and control equipment, telecommunication equipment, monitoring and assessment capabilities, and associated communication channels.

#### **Registered Entity Evidence (Required):**

The following information is requested for each document submitted as evidence. Also, evidence submitted should be highlighted and bookmarked, as appropriate, to identify the exact location where evidence of compliance may be found.

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Aud	Audit Team Evidence Reviewed (This section to be completed by the Compliance Enforcement Authority):					

# Compliance Assessment Approach Specific to TOP-001-3, R9

This section to be completed by the Compliance Enforcement Authority

(R9) For all, or a sample of, outages selected by the auditor from a list provided by the entity, review evidence and verify the entity notified its Reliability Coordinator and impacted interconnected entities of outages as described in Requirement R9.

**Note to Auditor:** 

Auditor Notes:	

# **R10 Supporting Evidence and Documentation**

- **R10.** Each Transmission Operator shall perform the following as necessary for determining System Operating Limit (SOL) exceedances within its Transmission Operator Area:
  - **10.1.** Within its Transmission Operator Area, monitor Facilities and the status of Special Protection Systems, and
  - **10.2.** Outside its Transmission Operator Area, obtain and utilize status, voltages, and flow data for Facilities and the status of Special Protection Systems.
- M10. Each Transmission Operator shall have, and provide upon request, evidence that could include but is not limited to Energy Management System description documents, computer printouts, SCADA data collection, or other equivalent evidence that will be used to confirm that it monitored or obtained and utilized status, voltages, and flow data for Facilities, and the status of Special Protection Systems as required to determine any System Operating Limit (SOL) exceedances within its Transmission Operator Area.

# **Compliance Narrative (Required):**

Provide a brief explanation, in your own words, of how you comply with this Requirement. References to supplied evidence, including links to the appropriate page, are recommended.

# Evidence Requested i:

# Provide the following evidence, or other evidence to demonstrate compliance.

Energy Management System (EMS) description documents, computer printouts, summary of SCADA collections of Real-time monitoring telemetry, or other equivalent evidence that will be used to confirm that the entity, for the purpose of determining System Operating Limit (SOL) exceedances, has monitored Facilities and Special Protection Systems within its Transmission Operator Area and obtained and utilized status, voltages, and flow data for Facilities and the status of Special Protection Systems outside its Transmission Operator Areas, and

#### Registered Entity Evidence (Required):

The following information is requested for each document submitted as evidence. Also, evidence submitted should be highlighted and bookmarked, as appropriate, to identify the exact location where evidence of compliance may be found.

File Name	Document Title	Revision or Version	Document Date	Relevant Page(s) or Section(s)	Description of Applicability of Document

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Audit Team Evidence Revi	ewed (This section to be completed by the Compliance Enforcement Authority):
Compliance Assessment A	pproach Specific to TOP-001-3, R10
•	ed by the Compliance Enforcement Authority
(R10) For all, or a sa	ample of, Facilities and Special Protection Systems within or outside its
Transmission Opera	ator Area, review evidence and determine if the entity monitored them to
determine any Syst	em Operating Limit exceedances for items within its Transmission Operator Area
and obtained and u	tilized status, voltages, and flow data for Facilities and the status of Special
<b>Protection Systems</b>	for items outside its Transmission Operator Area.
Note to Auditor:	
Auditor Notes:	

# R11 Supporting Evidence and Documentation

- **R11.** Each Balancing Authority shall monitor its Balancing Authority Area, including the status of Special Protection Systems that impact generation or Load, in order to maintain Load-interchange balance within its Balancing Authority Area and support Interconnection frequency.
- M11. Each Balancing Authority shall have, and provide upon request, evidence that could include but is not limited to Energy Management System description documents, computer printouts, SCADA data collection, or other equivalent evidence that will be used to confirm that it monitors its Balancing Authority Area, including the status of Special Protection Systems that impact generation or Load, in order to maintain Load-interchange balance within its Balancing Authority Area and support Interconnection frequency.

# **Compliance Narrative (Required):**

Provide a brief explanation, in your own words, of how you comply with this Requirement. References
supplied evidence, including links to the appropriate page, are recommended.

# Evidence Requested i:

Provide the following evidence, or other evidence to demonstrate compliance.

Documentary evidence (such as outlined in Measure M11) that demonstrates that the entity monitors its Balancing Authority Area.

# Registered Entity Evidence (Required):

The following information is requested for each document submitted as evidence. Also, evidence submitted should be highlighted and bookmarked, as appropriate, to identify the exact location where evidence of compliance may be found.

File Name	Document Title	Revision or Version	Document Date	Relevant Page(s) or Section(s)	Description of Applicability of Document

Audit Team Evidence Reviewed (This section to be completed by the Compliance Enforcement Authority):				

Compliance Assessment Approach Specific to TOP-001-3, R11

This section to be completed by the Compliance Enforcement Authority

(R11) Review the documentation provided to verify that the entity's Balancing Authority Area was monitored as specified in Requirement R11.

**Note to Auditor:** 

**Auditor Notes:** 



# **R12 Supporting Evidence and Documentation**

- **R12.** Each Transmission Operator shall not operate outside any identified Interconnection Reliability Operating Limit (IROL) for a continuous duration exceeding its associated IROL  $T_v$ .
- **M12.** Each Transmission Operator shall make available evidence to show that for any occasion in which it operated outside any identified Interconnection Reliability Operating Limit (IROL), the continuous duration did not exceed its associated IROL T<sub>v</sub>. Such evidence could include but is not limited to dated computer logs or reports in electronic or hard copy format specifying the date, time, duration, and details of the excursion. If such a situation has not occurred, the Transmission Operator may provide an attestation that an event has not occurred.

Registered	d Entity	Response	(Requ	ired	<b>)</b> :
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<b>Question:</b> Did the entity exceed an identified IROL for any period of time during the compliance monitoring
period?
□ Yes □ No
If No, state how this was ascertained. If yes, provide a list of such instances and include evidence the system was returned to within the IROL within the IROL $T_v$ .
[Note: A separate spreadsheet or other document may be used. If so, provide the document reference below.]
Compliance Narrative (Required):
Provide a brief explanation, in your own words, of how you comply with this Requirement. References to supplied evidence, including links to the appropriate page, are recommended.

# Evidence Requested i:

Provide the following evidence, or other evidence to demonstrate compliance.

Documentary evidence (such as outlined in Measure M12) that demonstrates that the entity did not operate outside any identified IROL for a continuous duration exceeding its associated IROL  $T_{\nu}$ .

# Registered Entity Evidence (Required):

The following information is requested for each document submitted as evidence. Also, evidence submitted should be highlighted and bookmarked, as appropriate, to identify the exact location where evidence of compliance may be found.

				Relevant	
		Revision		Page(s)	
		or	Document	or	Description of Applicability
File Name	Document Title	Version	Date	Section(s)	of Document

udit Team Evidence Revie	wed (This section to be co	mpleted by the	Compliance	Enforcement Authority):

# Compliance Assessment Approach Specific to TOP-001-3, R12

This section to be completed by the Compliance Enforcement Authority

(R12) For a sample of BES events selected by the auditor, review evidence and verify the entity did not operate outside any IROL for a continuous duration exceeding its associated IROL  $T_{\nu}$ .

**Note to Auditor:** Auditors are advised to monitor compliance with Requirement R12 during events, due to the importance of compliance with Requirement R12 in such instances. Auditors can obtain a population of events for sampling from NERC's, or the Regional Entity's records of mandatory event reports, other information available at the Regional Entities, or a query of the entity. Auditors should monitor compliance specifically for category 2.g events since these are specifically exceedances of IROLs for time T<sub>v</sub>.

Auditor Notes:				

# **R13 Supporting Evidence and Documentation**

- **R13.** Each Transmission Operator shall ensure that a Real-time Assessment is performed at least once every 30 minutes.
- **M13.** Each Transmission Operator shall have, and make available upon request, evidence to show it ensured that a Real-Time Assessment was performed at least once every 30 minutes. This evidence could include but is not limited to dated computer logs showing times the assessment was conducted, dated checklists, or other evidence.

# **Compliance Narrative (Required):**

Provide a brief explanation, in your own words, of how you comply with this Requirement. References to supplied evidence, including links to the appropriate page, are recommended.

# Evidence Requested i:

Provide the following evidence, or other evidence to demonstrate compliance.

Documentary evidence (as outlined in Measure M13) that demonstrates that the entity ensured a Real-time Assessment was performed at least once every 30 minutes.

# Registered Entity Evidence (Required):

The following information is requested for each document submitted as evidence. Also, evidence submitted should be highlighted and bookmarked, as appropriate, to identify the exact location where evidence of compliance may be found.

File Name	Document Title	Revision or Version	Document Date	Relevant Page(s) or Section(s)	Description of Applicability of Document

Audit	Team Evidence Reviewed (Th	is section t	o be completed	by the Complia	ance Enforceme	nt Authority):

# Compliance Assessment Approach Specific to TOP-001-3, R13

This section to be completed by the Compliance Enforcement Authority

(R13) Review documentary evidence that demonstrates that the Transmission Operator ensured a Real-time Assessment was performed at least once every 30 minutes.

**Note to Auditor:** Auditors are advised to monitor compliance with Requirement R13 during events, due to the importance of Real-time Assessments in such instances. Auditors can obtain a population of events for

sampling from NERC's, or the Reliability Entity's, records of mandatory event reports, other information available at the Regional Entities, or a query of the entity. Auditors are encouraged to monitor compliance during the most critical events on the entity's system occurring during the compliance monitoring period.

**Auditor Notes:** 



# **R14 Supporting Evidence and Documentation**

- **R14.** Each Transmission Operator shall initiate its Operating Plan to mitigate a SOL exceedance identified as part of its Real-time monitoring or Real-time Assessment.
- **M14.** Each Transmission Operator shall have evidence that it initiated its Operating Plan for mitigating SOL exceedances identified as part of its Real-time monitoring or Real-time Assessments. This evidence could include but is not limited to dated computer logs showing times the Operating Plan was initiated, dated checklists, or other evidence.

Registered Entity	y Response	(Required	<b>I)</b> :
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Question: Did the entity have any SOL exceedances during the compliance monitoring period?
□ Yes □ No
If Yes, provide a list of such exceedances. If No, describe how this was ascertained.
[Note: A separate spreadsheet or other document may be used. If so, provide the document reference
below.]
Compliance Narrative (Required):
Provide a brief explanation, in your own words, of how you comply with this Requirement. References to
supplied evidence, including links to the appropriate page, are recommended.

# Evidence Requested i:

Provide the following evidence, or other evidence to demonstrate compliance.

Documentary evidence (as outlined in Measure M14) that demonstrates that the entity initiated its Operating Plan to mitigate an SOL exceedance identified as part of its Real-time monitoring or Real-time Assessment.

#### Registered Entity Evidence (Required):

The following information is requested for each document submitted as evidence. Also, evidence submitted should be highlighted and bookmarked, as appropriate, to identify the exact location where evidence of compliance may be found.

	File Name	Document Title	Revision or Version	Document Date	Relevant Page(s) or Section(s)	Description of Applicability of Document
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Audit Team Evidence Reviewed (This section to be completed by the Compliance Enforcement Authority):

# Compliance Assessment Approach Specific to TOP-001-3, R14 This section to be completed by the Compliance Enforcement Authority (R14) For all, or a sample of, SOL exceedances, review documentary evidence that demonstrates that the entity initiated its Operating Plan to mitigate an SOL exceedance identified as part of its Real-time monitoring or Real-time Assessment. Note to Auditor:

# **R15 Supporting Evidence and Documentation**

- **R15.** Each Transmission Operator shall inform its Reliability Coordinator of actions taken to return the System to within limits when a SOL has been exceeded.
- **M15.** Each Transmission Operator shall make available evidence that it informed its Reliability Coordinator of actions taken to return the System to within limits when a SOL was exceeded. Such evidence could include but is not limited to dated operator logs, voice recordings or transcripts of voice recordings, or dated computer printouts. If such a situation has not occurred, the Transmission Operator may provide an attestation.

Registered Entity Response (Required):
Question: Did the entity have any SOL exceedances during the compliance monitoring period?
□ Yes □ No
If No, describe how this was ascertained. If Yes, provide a list of such exceedances and evidence of having
informed the Reliability Coordinator of actions to return the system to within limits.
[Note: A separate spreadsheet or other document may be used. If so, provide the document reference
below.]
Compliance Narrative (Required):
Compliance Narrative (Required):  Provide a brief explanation, in your own words, of how you comply with this Requirement. References to
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Provide a brief explanation, in your own words, of how you comply with this Requirement. References to supplied evidence, including links to the appropriate page, are recommended.

# **Registered Entity Evidence (Required):**

The following information is requested for each document submitted as evidence. Also, evidence submitted should be highlighted and bookmarked, as appropriate, to identify the exact location where evidence of compliance may be found.

Reliability Coordinator of its actions to return the system to within limits when an SOL has been exceeded.

File Name	Document Title	Revision or Version	Document Date	Relevant Page(s) or Section(s)	Description of Applicability of Document

Audit Team Evidence Reviewed (This section to be completed by the Compliance Enforcement Authority)
Compliance Assessment Approach Specific to TOP-001-3, R15
This section to be completed by the Compliance Enforcement Authority
(R15) For all, or a sample of, SOL exceedances, review documentary evidence that demonstrates the
entity informed its RC of its actions to return the system to within limits when an SOL had been
exceeded.
<b>Note to Auditor:</b> Note the entity's response to applicability Question for Requirement R14 of this
document, when selecting a sample for audit testing.
Auditor Notes:

# R16 Supporting Evidence and Documentation

- **R16.** Each Transmission Operator shall provide its System Operators with the authority to approve planned outages and maintenance of its telemetering and control equipment, monitoring and assessment capabilities, and associated communication channels between affected entities.
- **M16.** Each Transmission Operator shall have, and provide upon request, evidence that could include but is not limited to a documented procedure or equivalent evidence that will be used to confirm that the Transmission Operator has provided its System Operators with the authority to approve planned outages and maintenance of telemetering and control equipment, monitoring and assessment capabilities, and associated communication channels between affected entities.

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Provide a brief explanation, in your own words, of how you comply with this Requirement. References to
supplied evidence, including links to the appropriate page, are recommended.

# Evidence Requested ::

# Provide the following evidence, or other evidence to demonstrate compliance.

Documentary evidence (as outlined in Measure M16) that demonstrates that the entity provided its System Operators with the authority to approve planned outages of its monitoring, telecommunication, and analysis capabilities.

# Registered Entity Evidence (Required):

The following information is requested for each document submitted as evidence. Also, evidence submitted should be highlighted and bookmarked, as appropriate, to identify the exact location where evidence of compliance may be found.

File Name	Document Title	Revision or Version	Document Date	Relevant Page(s) or Section(s)	Description of Applicability of Document

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#### Compliance Assessment Approach Specific to TOP-001-3, R16

This section to be completed by the Compliance Enforcement Authority

(R16) Review documentary evidence, such as job descriptions or desk procedure(s), that demonstrates

the entity provided its System Operators with the authority to approve planned outages of its telemetering and control equipment, monitoring and assessment capabilities and associated communication channels between affected entities.

(R16) Interview entity representatives to determine if they provided their System Operators with the authority to approve planned outages of its own telemetering and control equipment, monitoring and assessment capabilities and associated communication channels between affected entities.

**Note to Auditor:** This authority can also be confirmed during System Operator interview questions.

# **Auditor Notes:**



# R17 Supporting Evidence and Documentation

- **R17.** Each Balancing Authority shall provide its System Operators with the authority to approve planned outages and maintenance of its telemetering and control equipment, monitoring and assessment capabilities and associated communication channels between affected entities.
- M17. Each Balancing Authority shall have, and provide upon request, evidence that could include but is not limited to a documented procedure or equivalent evidence that will be used to confirm that the Balancing Authority has provided its System Operators with the authority to approve planned outages and maintenance of its telemetering and control equipment, monitoring and assessment capabilities and associated communication channels between affected entities.

Provide a brief explanation, in your own words, of how you comply with this Requirement. References to
supplied evidence, including links to the appropriate page, are recommended.

# Evidence Requested i:

Provide the following evidence, or other evidence to demonstrate compliance.

Documentary evidence (such as outlined in Measure M17) that demonstrates that the entity provided its System Operators with the authority to approve planned outages of its own monitoring and analysis capabilities.

# Registered Entity Evidence (Required):

The following information is requested for each document submitted as evidence. Also, evidence submitted should be highlighted and bookmarked, as appropriate, to identify the exact location where evidence of compliance may be found.

File Name	Document Title	Revision or Version	Document Date	Relevant Page(s) or Section(s)	Description of Applicability of Document

Αι	udit Team Evidence Reviewed (This section to be completed by the Compliance Enforcement Authority):

#### Compliance Assessment Approach Specific to TOP-001-3, R17

This section to be completed by the Compliance Enforcement Authority

(R17) Review documentary evidence, such as job descriptions or desk procedure(s), that demonstrates that

the entity provided its System Operators with the authority to approve planned outages of its telemetering and control equipment, monitoring and assessment capabilities and associated communication channels between affected entities.

(R17) Interview entity representatives to determine if they provided their System Operators with the authority to approve planned outages of telemetering and control equipment, monitoring and assessment capabilities and associated communication channels between affected entities.

Note to Auditor: This authority can also be confirmed during System Operator interviews.

#### **Auditor Notes:**



# **R18 Supporting Evidence and Documentation**

- **R18.** Each Transmission Operator shall operate to the most limiting parameter in instances where there is a difference in SOLs.
- **M18.** Each Transmission Operator shall have, and provide upon request, evidence that could include but is not limited to operator logs, voice recordings, electronic communications, or equivalent evidence that will be used to determine if it operated to the most limiting parameter in instances where there is a difference in SOLs.

<b>Question:</b> Did the entity experience an instance where there was a different in SOLs during the compliance
monitoring period?
☐ Yes ☐ No
If No, state how this was ascertained. If yes, provide a list of such instances and include evidence the system
was operated to the most limiting parameter.
[Note: A separate spreadsheet or other document may be used. If so, provide the document reference below.]
Compliance Narrative (Required):
Provide a brief explanation, in your own words, of how you comply with this Requirement. References to
supplied evidence, including links to the appropriate page, are recommended.

# Evidence Requested ::

Provide the following evidence, or other evidence to demonstrate compliance.

Documentary evidence (such as outlined in Measure M18) that demonstrates that the entity always operated to the most limiting parameter in instances where there was a difference in SOLs.

# Registered Entity Evidence (Required):

The following information is requested for each document submitted as evidence. Also, evidence submitted should be highlighted and bookmarked, as appropriate, to identify the exact location where evidence of compliance may be found.

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Audit Team Evidence Reviewed (This section to be completed by the Compliance Enforcement Authority):
Compliance Assessment Approach Specific to TOP-001-3, R18
This section to be completed by the Compliance Enforcement Authority
(R18) For all, or a sample of, BES events selected by the auditor, review evidence and verify the entity operated to the most limiting parameter in instances where there was a difference in SOLs.
Note to Auditor: Auditors are advised to monitor compliance with Requirement R18 during events, due to
the importance of compliance with Requirement R18 in such instances. Auditors can obtain a population of
events for sampling from NERC's, or Regional Entity's, records of mandatory event reports , other
information available at the Regional Entities, or a query of the entity. Auditors are encouraged to monitor
compliance during the most critical events on the entity's system occurring during the compliance
monitoring period. In the absence of events where differences in SOL exist, auditors should understand the
entity's process for complying with Requirement R18 and walkthrough examples of instances where the
entity would need to operate to the most limiting parameter when there were differences in SOLs.
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Auditor Notes:

# **R19 Supporting Evidence and Documentation**

- **R19.** Each Transmission Operator shall have data exchange capabilities with the entities that it has identified that it needs data from in order to maintain reliability in its Transmission Operator Area.
- **M19.** Each Transmission Operator shall have, and provide upon request, evidence that could include, but is not limited to, operator logs, system specifications, or other evidence that it has data exchange capabilities with the entities that it has identified that it needs data from in order to maintain reliability in its Transmission Operator Area.

# **Compliance Narrative (Required):**

Provide a brief explanation, in your own words, of how you comply with this Requirement. References to supplied evidence, including links to the appropriate page, are recommended.

# Evidence Requested i:

# Provide the following evidence, or other evidence to demonstrate compliance.

List of other entities that the audited entity has identified that it needs Real-time data from in order to maintain reliability in its Transmission Operator Area.

Operator logs, system specification, or other evidence that the entity has data exchange capabilities with the entities that it has identified that it needs data from.

# Registered Entity Evidence (Required):

The following information is requested for each document submitted as evidence. Also, evidence submitted should be highlighted and bookmarked, as appropriate, to identify the exact location where evidence of compliance may be found.

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Audit Team Evidence Reviewed (This section to be completed by the Compliance Enforcement Authority):

# Compliance Assessment Approach Specific to TOP-001-3, R19

This section to be completed by the Compliance Enforcement Authority

(R19) For all, or a sample of, entities that the audited entity has identified that it needs Real-time data from in order to maintain reliability in its Transmission Operator Area, review evidence to verify the

	entity has data exchange capabilities	with those identified entities.
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Note to Auditor:

**Auditor Notes:** 



#### **R20 Supporting Evidence and Documentation**

- **R20.** Each Balancing Authority shall have data exchange capabilities with the entities that it has identified that it needs data from in order to maintain reliability in its Balancing Authority Area.
- **M20.** Each Balancing Authority shall have, and provide upon request, evidence that could include, but is not limited to, operator logs, system specifications, or other evidence that it has data exchange capabilities with the entities that it has identified that it needs data from in order to maintain reliability in its Balancing Authority Area.

# **Compliance Narrative (Required):**

Provide a brief explanation, in your own words, of how you comply with this Requirement. References to supplied evidence, including links to the appropriate page, are recommended.

# Evidence Requested i:

Provide the following evidence, or other evidence to demonstrate compliance.

List of other entities that the audited entity has identified that it needs Real-time data from in order to maintain reliability in its Balancing Authority Area.

Operator logs, system specification, or other evidence that the entity has data exchange capabilities with the entities that it has identified that it needs data from.

# Registered Entity Evidence (Required):

The following information is requested for each document submitted as evidence. Also, evidence submitted should be highlighted and bookmarked, as appropriate, to identify the exact location where evidence of compliance may be found.

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Audit Team Evidence Reviewed (This section to be completed by the Compliance Enforcement Authority):				

# Compliance Assessment Approach Specific to TOP-001-3, R20

This section to be completed by the Compliance Enforcement Authority

(R20) For all, or a sample of, entities that the audited entity has identified that it needs Real-time data from

in order to maintain reliability in its Balancing Authority Area, review evidence to verify the entity has data
exchange capabilities with those identified entities.

**Note to Auditor:** 

**Auditor Notes:** 



# **Additional Information:**

# **Reliability Standard**

To be inserted by RSAW developer prior to posting of this RSAW associated with the enforceable date of this Reliability Standard.

# **Sampling Methodology**

To be inserted by RSAW developer prior to posting of this RSAW associated with the enforceable date of this Reliability Standard, if applicable.

# **Regulatory Language**

To be inserted by NERC Legal prior to posting of this RSAW associated with the enforceable date of this Reliability Standard.

# **Selected Glossary Terms**

To be inserted by RSAW developer prior to posting of this RSAW associated with the enforceable date of this Reliability Standard, if applicable.

# **Revision History for RSAW**

Version	Date	Reviewers	Revision Description
1	06/20/2014	Initial Posting	New Document
2	08/29/2014	NERC Compliance, NERC Standards, RSAWTF	Revisions for updated standard language and comments received during comment period.
3	10/16/2014	NERC Compliance, NERC Standards	Revisions for updated standard language and comments received during second comment period.
4	12/05/2014	NERC Compliance, NERC Standards	Revisions for updated standard language and comments received during third comment period.

<sup>&</sup>lt;sup>1</sup> Items in the Evidence Requested section are suggested evidence that may, but will not necessarily, demonstrate compliance. These items are not mandatory and other forms and types of evidence may be submitted at the entity's discretion.