

Reliability Standard Audit Worksheet¹

EOP-011-1 – Emergency 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)²: 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

| | BA | DP | GO | GOP | IA | LSE | PA | PSE | RC | RP | RSG | TO | TOP | TP | TSP |
|----|----|----|----|-----|----|-----|----|-----|----|----|-----|----|-----|----|-----|
| R1 | | | | | | | | | | | | | X | | |
| R2 | X | | | | | | | | | | | | | | |
| R3 | | | | | | | | | X | | | | | | |
| R4 | X | | | | | | | | | | | | X | | |
| R5 | | | | | | | | | X | | | | | | |
| R6 | | | | | | | | | X | | | | | | |

Legend:

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| 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 |

¹ 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.

² Compliance Assessment Date(s): The date(s) the actual compliance assessment (on-site audit, off-site spot check, etc.) occurs.

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Findings

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

| Req. | Finding | Summary and Documentation | Functions Monitored |
|------|---------|---------------------------|---------------------|
| R1 | | | |
| R2 | | | |
| R3 | | | |
| R4 | | | |
| R5 | | | |
| R6 | | | |

| Req. | Areas of Concern |
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| Req. | Recommendations |
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| Req. | Positive Observations |
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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) |
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R1 Supporting Evidence and Documentation

- R1.** Each Transmission Operator shall develop, maintain, and implement one or more Reliability Coordinator-reviewed Operating Plan(s) to mitigate operating Emergencies in its Transmission Operator Area. The Operating Plan(s) shall include the following, as applicable:
 - 1.1.** Roles and responsibilities for activating the Operating Plan(s);
 - 1.2.** Processes to prepare for and mitigate Emergencies including:
 - 1.2.1.** Notification to ~~the~~ Reliability Coordinator, to include current and projected conditions, when experiencing an operating Emergency;
 - 1.2.2.** Cancellation or recall of Transmission and generation outages;
 - 1.2.3.** Transmission system reconfiguration;
 - 1.2.4.** Redispatch of generation request;
 - 1.2.5.** Provisions for operator-controlled manual Load shedding that minimizes the overlap with automatic Load shedding and are capable of being implemented in a timeframe adequate for mitigating the Emergency; and
 - 1.2.6.** Reliability impacts of extreme weather conditions.
- M1.** Each Transmission Operator will have a dated Operating Plan(s) developed in accordance with Requirement R1 and reviewed by its Reliability Coordinator; evidence such as a review or revision history to indicate that the Operating Plan(s) has been maintained; and will have as evidence, such as operator logs or other operating documentation, voice recordings or other communication documentation to show that its Operating Plan(s) was implemented for times when an Emergency has occurred, in accordance with Requirement R1.

Registered Entity Response (Required):

Question: Has there ever been an Emergency where ~~this the Transmission~~ the Transmission Operator's Operating Plan(s) has been implemented to mitigate operating Emergencies ~~has been implemented~~ during the compliance monitoring period? Yes No

If Yes, provide a list of such Emergencies.

[Note: A separate spreadsheet or other document may be used. If so, provide the document reference below.]

An entity may have combined plans as a Transmission Operator and Balancing Authority.

Registered Entity Response (Required):

Compliance Narrative:

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.

Documented plan(s).

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Evidence of activation, such as operator logs, voice recordings, or other communications, for times when an Emergency has occurred.

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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Compliance Assessment Approach Specific to EOP-011-1, R1

This section to be completed by the Compliance Enforcement Authority

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| | (R1) Confirm <u>the</u> plan(s) is dated and reviewed by the <u>its</u> Reliability Coordinator. |
| | (R1) Confirm <u>the</u> plan(s) was developed in accordance with Requirement R1 and includes <u>processes for</u> the following <u>as applicable</u> : |
| | (Part 1.1) Roles and responsibilities for activating the Operating Plan(s); |
| | (Part 1.2.1) Notification <u>of its</u> to the Reliability Coordinator, to include current and projected conditions, when experiencing an operating Emergency; |
| | (Part 1.2.2) Cancellation or recall of Transmission and generation outages; |
| | (Part 1.2.3) Transmission system reconfiguration; |
| | (Part 1.2.4) Redispatch of generation; |
| | (Part 1.2.5) Provisions for operator-controlled manual Load shedding that minimizes the overlap with automatic Load shedding and are capable of being implemented in a timeframe adequate for mitigating the Emergency; |
| | (Part 1.2.6) Reliability impacts of extreme weather conditions. |
| | (R1) Verify implementation of plan(s). (see note below) |

Note to Auditor:

Auditors can gain reasonable assurance the plan(s) was implemented by determining if specific actions prescribed by the plan(s) have taken place. For example, if the plan(s) calls for certain ~~procedures~~ processes to occur, then auditors could ask for evidence demonstrating the ~~procedure~~ process has been implemented. As auditors should obtain reasonable, not absolute, assurance the plan(s) was implemented, testing implementation on a sample basis may be appropriate.

Auditor Notes:

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R2 Supporting Evidence and Documentation

- R2.** Each Balancing Authority shall develop, maintain, and implement ~~a~~one or more Reliability Coordinator-reviewed Operating Plan(s) to mitigate Capacity Emergencies and Energy Emergencies within its Balancing Authority Area. The Operating Plan(s) shall include the following, as applicable:
- 2.1.** Roles and responsibilities for activating the Operating Plan(s);
 - 2.2.** Processes to prepare for and mitigate Emergencies including:
 - 2.2.1.** Notification to ~~the~~its Reliability Coordinator, to include current and projected conditions when experiencing a Capacity Emergency or Energy Emergency;
 - 2.2.2.** Requesting an Energy Emergency Alert, per Attachment 1;
 - 2.2.3.** Managing generating resources in its Balancing Authority Area to address:
 - 2.2.3.1.** capability and availability;
 - 2.2.3.2.** fuel supply and inventory concerns;
 - 2.2.3.3.** fuel switching capabilities; and
 - 2.2.3.4.** environmental constraints.
 - 2.2.4.** Public appeals for voluntary Load reductions;
 - 2.2.5.** Requests to government agencies to implement their programs to achieve necessary energy reductions;
 - 2.2.6.** Reduction of internal utility energy use;
 - 2.2.7.** Use of Interruptible Load, curtailable Load and demand response;
 - 2.2.8.** Provisions for operator-controlled manual Load shedding that minimizes the overlap with automatic Load shedding and are capable of being implemented in a timeframe adequate for mitigating the Emergency; and
 - 2.2.9.** Reliability impacts of extreme weather conditions.
- M2.** Each Balancing Authority will have a dated Operating Plan(s) developed in accordance with Requirement R2 and reviewed by its Reliability Coordinator; evidence such as a review or revision history to indicate that the Operating Plan(s) has been maintained; and will have as evidence, such as operator logs or other operating documentation, voice recordings, or other communication documentation to show that its Operating Plan(s) was implemented for times when an Emergency has occurred, in accordance with Requirement R2.

Registered Entity Response (Required):

Question: Has there ever been an Emergency where ~~this~~the Balancing Authority's Operating Plan(s) has been implemented to mitigate Capacity Emergencies and Energy Emergencies ~~has been implemented~~ during the compliance monitoring period? Yes No

If Yes, provide a list of such Emergencies.

[Note: A separate spreadsheet or other document may be used. If so, provide the document reference below.]

An entity may have combined plans as a Transmission Operator and Balancing Authority.

Registered Entity Response (Required):

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

RSAW Version: RSAW_EOP-011-1_2014_v32 Revision Date: ~~September~~October, 2014 RSAW Template: RSAW2014R1.2

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Compliance Narrative:

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.

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Evidence Requested:ⁱ

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| Provide the following evidence, or other evidence to demonstrate compliance. |
| Documented plan(s). |
| Evidence of activation, such as operator logs, voice recordings, or other communications, for times when an Emergency has occurred. |

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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| 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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Compliance Assessment Approach Specific to EOP-011-1, R2

This section to be completed by the Compliance Enforcement Authority

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| | (R2) Confirm <u>the</u> plan(s) is dated and reviewed by the <u>its</u> Reliability Coordinator. |
| | (R2) Confirm <u>the</u> plan(s) was developed in accordance with Requirement R2 and includes <u>processes for</u> the following <u>as applicable</u> : |
| | (Part 2.1.) Roles and responsibilities for activating the Operating Plan(s); |
| | (Part 2.2) Processes to prepare for and mitigate Emergencies including: |
| | (Part 2.2.1) Notification to the <u>of its</u> Reliability Coordinator, to include current and projected conditions when experiencing a Capacity Emergency or Energy Emergency; |
| | (Part 2.2.2) Requesting an Energy Emergency Alert, per Attachment 1; |
| | (Part 2.2.3) Managing generating resources in its Balancing Authority Area to address: |
| | (Part 2.2.3.1) capability and availability; |
| | (Part 2.2.3.2) fuel supply and inventory concerns; |
| | (Part 2.2.3.3) fuel switching capabilities; and |
| | (Part 2.2.3.4) environmental constraints. |

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| | (Part 2.2.4) Public appeals for voluntary Load reductions; |
| | (Part 2.2.5) Requests to government agencies to implement their programs to achieve necessary energy reductions; |
| | (Part 2.2.6) Reduction of internal utility energy use; |
| | (Part 2.2.7) Use of Interruptible Load, curtailable Load and demand response; |
| | (Part 2.2.8) Provisions for operator-controlled manual Load shedding that minimizes the overlap with automatic Load shedding and are capable of being implemented in a timeframe adequate for mitigating the Emergency; and |
| | (Part 2.2.9) Reliability impacts of extreme weather conditions. |
| | (R2) Verify implementation of plan(s). (see note below) |

Note to Auditor:

Auditors can gain reasonable assurance the plan(s) was implemented by determining if specific actions prescribed by the plan(s) have taken place. For example, if the plan(s) calls for certain ~~procedures~~ processes to occur, then auditors could ask for evidence demonstrating the ~~procedure~~ process has been implemented. As auditors should obtain reasonable, not absolute, assurance the plan(s) was implemented, testing implementation on a sample basis may be appropriate.

Auditor Notes:

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R3 Supporting Evidence and Documentation

R3. The Reliability Coordinator, ~~within 30 calendar days of receipt,~~ shall review ~~each~~the Operating Plan(s) to mitigate operating Emergencies submitted by a Transmission Operator or a Balancing Authority regarding any reliability risks that are identified between Operating Plans.

3.1. Within 30 calendar days of receipt, ~~T~~the Reliability Coordinator shall:

3.1.1. Review each submitted Operating Plan(s) on the basis of compatibility and inter-dependency with other Balancing Authorities' and Transmission Operators' Operating Plans;

3.1.2. Review each submitted Operating Plan(s) for coordination to avoid risk to Wide Area reliability; and

3.1.3. Notify each Balancing Authority and Transmission Operator of the results of its review, ~~specifying any time frame for resubmittal of its Operating Plan(s) if revisions are identified.~~

M3. The Reliability Coordinator will have documentation, such as dated e-mails or other correspondences that it reviewed Transmission Operator and Balancing Authority Operating Plans within 30 calendar days of submittal in accordance with Requirement R3.

Registered Entity Response (Required):

Compliance Narrative:

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.

The Reliability Coordinator will have documentation, such as dated e-mails or other correspondences that it reviewed Transmission Operator and Balancing Authority Operating Plans within ~~30~~ calendar days of submittal in accordance with Requirement R3.

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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Compliance Assessment Approach Specific to EOP-011-1, R3

This section to be completed by the Compliance Enforcement Authority

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| (R3) Through the review of submitted evidence and interviews with entity representatives, confirm that the Reliability Coordinator reviews plans within 30-calendar days. |
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| Note to Auditor: |
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Auditor Notes:

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R4 Supporting Evidence and Documentation

- R4.** Each Transmission Operator and Balancing Authority shall address any reliability risks identified by its Reliability Coordinator pursuant to Requirement R3 and resubmit its Operating Plan(s) to its Reliability Coordinator within a time period specified by its Reliability Coordinator.
- M4.** The Transmission Operator and Balancing Authority will have documentation, such as dated emails or other correspondence, with an Operating Plan(s) version history showing that it responded and updated the Operating Plan(s) within the timeframe identified by its Reliability Coordinator in accordance with Requirement R4.

Registered Entity Response (Required):

Question: Did entity’s Reliability Coordinator identify any reliability risks associated with entity’s Operating Plan(s) during the compliance monitoring period?

Yes No

If Yes, provide a list of notifications. If auditor is reasonably assured of entity’s No answer, then no further audit testing of Requirement R4 is necessary. then Requirement R4 is not applicable.

[Note: A separate spreadsheet or other document may be used. If so, provide the document reference below.]

Registered Entity Response (Required):

Compliance Narrative:

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.
 Dated correspondences between the entity and Reliability Coordinator regarding revisions to the entity’s Operating Plan(s) based on reliability risks identified by the Reliability Coordinator.

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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Compliance Assessment Approach Specific to EOP-011-1, R4

This section to be completed by the Compliance Enforcement Authority

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| (R4) Review evidence and verify <u>the</u> entity resubmitted its <u>O</u> perating <u>P</u> lan to its Reliability Coordinator within the time period specified by the Reliability Coordinator in instances where the Reliability Coordinator identified reliability risks associated with <u>the</u> entity's <u>O</u> perating <u>P</u> lan. |
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| Note to Auditor: |
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Auditor Notes:

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R5 Supporting Evidence and Documentation

- R5.** Each Reliability Coordinator that receives an Emergency notification from a Transmission Operator or Balancing Authority within its Reliability Coordinator Area shall notify, within 30 minutes from the time of receiving notification, other Balancing Authorities and Transmission Operators in its Reliability Coordinator Area, and neighboring Reliability Coordinators.

- M5.** Each Reliability Coordinator that receives an Emergency notification from a Balancing Authority or Transmission Operator within its Reliability Coordinator Area will have, and provide upon request, evidence that could include, but is not limited to, operator logs, voice recordings or transcripts of voice recordings, electronic communications, or equivalent evidence that will be used to determine if the Reliability Coordinator communicated, in accordance with Requirement R5, with other Balancing Authorities and Transmission Operators in its Reliability Coordinator Area, and neighboring Reliability Coordinators .

Registered Entity Response (Required):

Question: Has the Reliability Coordinator received an Emergency notification from a Transmission Operator or Balancing Authority during the compliance monitoring period? Yes No

If Yes, provide a list of such notifications. If auditor is reasonably assure of entity's No answer, then no further audit testing of Requirement R5 is necessary. If no, the Requirement R5 is not applicable.

[Note: A separate spreadsheet or other document may be used. If so, provide the document reference below.]

Registered Entity Response (Required):

Compliance Narrative:

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 and time stamped evidence of notification of an Emergency received from a Transmission Operator or Balancing Authority and dated and time stamped evidence of the entity's notification of other impacted Balancing Authorities and Transmission Operators in its Reliability Coordinator Area, and neighboring Reliability Coordinators in 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 |
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Audit Team Evidence Reviewed (This section to be completed by the Compliance Enforcement Authority):

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Compliance Assessment Approach Specific to EOP-011-1, R5

This section to be completed by the Compliance Enforcement Authority

(R5) Through the review of submitted evidence, verify that the entity notified other impacted Balancing Authorities, and Transmission Operators in its Reliability Coordinator Area, and neighboring Reliability Coordinators of the Emergency as required by Requirement R5.

Note to Auditor:

Auditor Notes:

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R6 Supporting Evidence and Documentation

- R6.** Each Reliability Coordinator that has a Balancing Authority experiencing a potential or actual Energy Emergency within its Reliability Coordinator Area shall declare an Energy Emergency Alert, as detailed in Attachment 1.
- M6.** Each Reliability Coordinator, with a Balancing Authority experiencing a potential or actual Energy Emergency within its Reliability Coordinator Area, will have, and provide upon request, evidence that could include, but is not limited to, operator logs, voice recordings or transcripts of voice recordings, electronic communications, or equivalent evidence that it declared an Energy Emergency Alert, as detailed in Attachment 1, in accordance with Requirement R6.

Registered Entity Response (Required):

Question: ~~Has a Balancing Authority experienced a potential or actual Energy Emergency in the Reliability Coordinator's Area~~ Did the Reliability Coordinator receive a request from their Balancing Authority, or did the Reliability Coordinator declare an Energy Emergency Alert, as detailed in Attachment 1, during the compliance monitoring period? Yes No

If Yes, provide a list of such actual or potential Emergencies and proceed to the Evidence Requested section below. If auditor is reasonably assured of entity's Reliability Coordinator's No answer, then no further audit testing of Requirement R6 is necessary. If no, the Requirement R5 is not applicable.

[Note: A separate spreadsheet or other document may be used. If so, provide the document reference below.]

Registered Entity Response (Required):

Compliance Narrative:

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.

A list of all potential or actual Energy Emergencies in ~~entity's Reliability Coordinator's~~ entity's footprint and operator logs, voice recordings or transcripts of voice recordings, electronic communications or equivalent evidence that demonstrate initiation of an Energy Emergency Alert.

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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Compliance Assessment Approach Specific to EOP-011-1, R6

This section to be completed by the Compliance Enforcement Authority

(R6) For all, or a sample of, Balancing Authority potential or actual Energy Emergencies within the entity's Reliability Coordinator Area, verify the entity Reliability Coordinator declared an Energy Emergency Alert, as detailed in Attachment 1 of the EOP-011-1 Reliability Standard.

Note to Auditor:

Auditor Notes:

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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.

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Revision History for RSAW

| Version | Date | Reviewers | Revision Description |
|----------|----------------------|------------------------------------|---|
| 1 | 07/17/2014 | NERC Compliance, Standards, RSAWTF | New Document |
| 2 | 09/22/2014 | NERC Compliance, Standards, RSAWTF | Revisions based upon changes to standard for posting during first <u>second</u> formal comment period <u>and industry/Regional comments on RSAW.</u> |
| <u>3</u> | <u>110/0330/2014</u> | <u>NERC Compliance, Standards</u> | <u>Revisions based upon changes to standard for posting during second formal comment period and industry/Regional comments on RSAW.</u> |

ⁱ 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.