

**Reliability Standard Audit Worksheet[[1]](#footnote-1)**

VAR-001-4.2 – Voltage and Reactive Control

***This section to be completed by the Compliance Enforcement Authority.***

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| **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]](#footnote-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**

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|  | **BA** | **DP** | **GO** | **GOP** | **PA** | **RC** | **RP** | **RSG** | **TO** | **TOP** | **TP** | **TSP** |
| **R1** |  |  |  |  |  |  |  |  |  | X |  |  |
| **R2** |  |  |  |  |  |  |  |  |  | X |  |  |
| **R3** |  |  |  |  |  |  |  |  |  | X |  |  |
| **R4** |  |  |  |  |  |  |  |  |  | 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 |

Findings

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

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

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| **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):**

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| **SME Name** | **Title** | **Organization** | **Requirement(s)** |
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R1 Supporting Evidence and Documentation

1. Each Transmission Operator shall specify a system voltage schedule (which is either a range or a target value with an associated tolerance band) as part of its plan to operate within System Operating Limits and Interconnection Reliability Operating Limits.
	1. Each Transmission Operator shall provide a copy of the voltage schedules and associated tolerance bands to its Reliability Coordinator and adjacent Transmission Operators within 30 calendar days of a request.
2. The Transmission Operator shall have evidence that it specified system voltage schedules using either a range or a target value with an associated tolerance band.

For Part 1.1, the Transmission Operator shall have evidence that the voltage schedules (which is either a range or a target value with an associated tolerance band) were provided to its Reliability Coordinator and adjacent Transmission Operators within 30 calendar days of a request. Evidence may include, but is not limited to, emails, website postings, and meeting minutes.

**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[[3]](#endnote-1):

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| **Provide the following evidence, or other evidence to demonstrate compliance.**  |
| Evidence as outlined in R1 and documentation of request made per Part 1.1 from Reliability Coordinator and/or adjacent Transmission Operators, if applicable and requested by auditor. |

Registered Entity Evidence (Required):

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| **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 VAR-001-4.2, R1

***This section to be completed by the Compliance Enforcement Authority***

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|  | (R1) Review evidence provided and ensure it meets the requirements outlined in Requirement R1. |
|  |  (Part 1.1) Examine evidence to verify that voltage schedules were provided within 30 calendar days of request per Part 1.1. |
| **Note to Auditor:** Auditors, at their discretion and based on the risk of the entity’s compliance with this requirement to the BES, may communicate with Reliability Coordinators and other Transmission Operators to determine if data requests were made of the entity. Auditors may also accept entity assertions regarding whether data requests made.  |

Auditor Notes:

R2 Supporting Evidence and Documentation

1. Each Transmission Operator shall schedule sufficient reactive resources to regulate voltage levels under normal and Contingency conditions. Transmission Operators can provide sufficient reactive resources through various means including, but not limited to, reactive generation scheduling, transmission line and reactive resource switching, and using controllable load.
2. Each Transmission Operator shall have evidence of scheduling sufficient reactive resources based on their assessments of the system. For the operations planning time horizon, Transmission Operators shall provide copies of assessments used as the basis for how resources were scheduled.

**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.

Registered Entity Evidence (Required):

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| **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 VAR-001-4.2, R2

***This section to be completed by the Compliance Enforcement Authority***

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|  | (R2) Review the studies/assessments that entity used to schedule resources to determine that the studies show whether new resources should be brought online, or if the resources online are sufficient to regulate voltage levels. Auditors should verify that actual scheduling reflected the results of the studies/assessments.  |
| **Note to Auditor:**  |

Auditor Notes:

R3 Supporting Evidence and Documentation

1. Each Transmission Operator shall operate or direct the Real-time operation of devices to regulate transmission voltage and reactive flow as necessary.
2. Each Transmission Operator shall have evidence that actions were taken to operate capacitive and inductive resources as needed in Real-time. This may include, but is not limited to, directions to Generator Operators to: 1) provide additional voltage support; 2) bring resources on-line; or 3) make manual adjustments.

**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 Requestedi:

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| **Provide the following evidence, or other evidence to demonstrate compliance.**  |
| Evidence as outlined in R3 and any written policies, procedures or protocols describing how the entity operates or directs devices to regulate transmission voltage and reactive flow as necessary, if the entity has such documents. |

Registered Entity Evidence (Required):

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| **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 VAR-001-4.2, R3

***This section to be completed by the Compliance Enforcement Authority***

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|  | (R3) Review evidence to understand how entity operates or directs devices to regulate transmission voltage and reactive flow as necessary. Auditors may sample system events or other instances of voltage irregularities to verify that operations or directions occurred as required per Requirement R3. |
| **Note to Auditor:**  |

Auditor Notes:

R4 Supporting Evidence and Documentation

1. Each Transmission Operator shall specify the criteria that will exempt generators: 1) from following a voltage or Reactive Power schedule, 2) from having its automatic voltage regulator (AVR) in service or from being in voltage control mode, or 3) from having to make any associated notifications.
	1. If a Transmission Operator determines that a generator has satisfied the exemption criteria, it shall notify the associated Generator Operator.
2. Each Transmission Operator shall have evidence of the documented criteria for generator exemptions.

For Part 4.1, the Transmission Operator shall also have evidence to show that, for each generating unit in its area that is exempt : 1) from following a voltage or Reactive Power schedule, 2) from having its automatic voltage regulator (AVR) in service or from being in voltage control mode, or 3) from having to make any notifications, the associated Generator Operator was notified of this exemption.

**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.

Registered Entity Evidence (Required):

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| **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 VAR-001-4.2, R4

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|  | (R4) Review evidence and note existence of exemption criteria per Requirement R4. For a sample of exempted generators, verify that exemption was granted in accordance with criteria. |
|  | (Part 4.1) For a sample of exempted generators, ensure exempted generator was notified. |
| **Note to Auditor:** Requirement R4 allows for any combination of exemptions for Generator Operators 1) from voltage schedules, 2) from being in automatic voltage control mode, or 3) from any notification requirements, as long as the exemption meets the criteria specified by the entity. An auditor will not look for any pre-authorization from the entity; rather an auditor will verify that the Generator Operator has met the criteria set forth by the entity. |

Auditor Notes:

R5 Supporting Evidence and Documentation

1. Each Transmission Operator shall specify a voltage or Reactive Power schedule (which is either a range or a target value with an associated tolerance band) at either the high voltage side or low voltage side of the generator step-up transformer at the Transmission Operator’s discretion.
	1. The Transmission Operator shall provide the voltage or Reactive Power schedule (which is either a range or a target value with an associated tolerance band) to the associated Generator Operator and direct the Generator Operator to comply with the schedule in automatic voltage control mode (the AVR is in service and controlling voltage).
	2. The Transmission Operator shall provide the Generator Operator with the notification requirements for deviations from the voltage or Reactive Power schedule (which is either a range or a target value with an associated tolerance band).
	3. The Transmission Operator shall provide the criteria used to develop voltage or Reactive Power schedule (which is either a range or a target value with an associated tolerance band) to the Generator Operator within 30 days of receiving a request.
2. The Transmission Operator shall have evidence of a documented voltage or Reactive Power schedule (which is either a range or a target value with an associated tolerance band).

For Part 5.1, the Transmission Operator shall have evidence it provided a voltage or Reactive Power schedule (which is either a range or a target value with an associated tolerance band) to the applicable Generator Operators, and that the Generator Operator was directed to comply with the schedule in automatic voltage control mode, unless exempted.

For Part 5.2, the Transmission Operator shall have evidence it provided notification requirements for deviations from the voltage or Reactive Power schedule (which is either a range or a target value with an associated tolerance band). For Part 5.3, the Transmission Operator shall have evidence it provided the criteria used to develop voltage schedule or Reactive Power schedule (which is either a range or a target value with an associated tolerance band) within 30 days of receiving a request by a Generator Operator.

**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.

Registered Entity Evidence (Required):

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| **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 VAR-001-4.2, R5

***This section to be completed by the Compliance Enforcement Authority***

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|  | (R5) Verify existence of voltage or Reactive Power schedule and that it meets the requirements of Requirement R5. |
|  | (Part 5.1) For a sample of Generator Operators, verify voltage or Reactive Power schedule was provided per Part 5.1. |
|  | (Part 5.2) For a sample of Generator Operators, verify the notification requirements for deviations from the voltage or Reactive Power schedule was provided per Part 5.2. |
|  | (Part 5.3) For a sample of Generator Operators, verify criteria was provided as requested per Part 5.3. |
| **Note to Auditor:** It is clear based on VAR-001-4.2 Requirement R5 that a voltage or Reactive power schedule can be either: 1) a target number with a tolerance band, or 2) a voltage or Reactive Power range to operate within. An auditor would not expect to see a tolerance band provided with an operating range for voltage or Reactive Power. |

Auditor Notes:

R6 Supporting Evidence and Documentation

1. After consultation with the Generator Owner regarding necessary step-up transformer tap changes and the implementation schedule, the Transmission Operator shall provide documentation to the Generator Owner specifying the required tap changes, a timeframe for making the changes, and technical justification for these changes.
2. The Transmission Operator shall have evidence that it provided documentation to the Generator Owner when a change was needed to a generating unit’s step-up transformer tap in accordance with the requirement and that it consulted with the Generator Owner.

**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.

Registered Entity Evidence (Required):

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| **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 VAR-001-4.2, R6

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|  | (R6) Understand entity’s procedures concerning coordinating tap settings with Generator Owners per Requirement R6. |
|  | (R6) For all, or a sample of, Generator Owners where entity consulted regarding step-up transformer tap changes, verify entity documentation provided to Generator Owner included: |
|  | * The required tap changes
 |
|  | * Timeframe for changes
 |
|  | * Technical justification for changes
 |
| **Note to Auditor:**  |

Auditor Notes:

Additional Information:



Reliability Standard

Sampling Methodology

Sampling is essential for auditing compliance with NERC Reliability Standards since it is not always possible or practical to test 100% of either the equipment, documentation, or both, associated with the full suite of enforceable standards. The Sampling Methodology Guidelines and Criteria (see NERC website), or sample guidelines, provided by the Electric Reliability Organization help to establish a minimum sample set for monitoring and enforcement uses in audits of NERC Reliability Standards.

Regulatory Language

Regulatory Background

VAR-001-1 was approved by FERC in [Order No. 693](http://www.nerc.com/FilingsOrders/us/FERCOrdersRules/ORDER%20693.pdf)[[4]](#footnote-3) on March 16, 2007. In its approval, FERC directed NERC to address the reactive power requirements for LSEs on a comparable basis with purchasing-selling entities and include controllable load among the reactive resources to satisfy reactive requirements.

In the [letter order](http://www.nerc.com/FilingsOrders/us/FERCOrdersRules/1102011_order_stds.pdf) issued January 10, 2011, FERC approved VAR-001-2, which addressed the two directives outlined in Order no. 693 discussed above.

In the [letter order](http://www.nerc.com/FilingsOrders/us/FERCOrdersRules/Petition%20for%20Approval%20of%20Proposed%20Reliability%20Standard%20VAR-001-3%20%28WECC%20Variance%29.pdf) issued June 20, 2013, FERC approved VAR-001-3. This Standard addressed a WECC regional difference with voltage schedules in the Western Interconnection.

In the [letter order](http://www.nerc.com/FilingsOrders/us/FERCOrdersRules/VAR%20Letter%20Order.pdf) issued August 1, 2014, FERC approved VAR-001-4, which addresses voltage scheduling and both SOLs and IROLs. This Standard also addresses scheduling reactive resources to address voltage issues.

In the [letter order](http://www.nerc.com/FilingsOrders/us/FERCOrdersRules/Letter_Order_Errata_20151113_RD15-6.pdf) issued November 13, 2015, FERC approved an errata to VAR-001-4.

In the [letter order](http://www.nerc.com/FilingsOrders/us/FERCOrdersRules/Delegated%20Order%20Approving%20Errata%20to%20Voltage%20and%20Reactive%20Control%20Rel%20Stds%20RD17-7.pdf) issued September 26, 2017, FERC approved an errata to VAR-001-4.1.

FERC Orders

FERC Letter Order, Docket No. RD17-7-000 (Sept. 26, 2017).

<http://www.nerc.com/FilingsOrders/us/FERCOrdersRules/Delegated%20Order%20Approving%20Errata%20to%20Voltage%20and%20Reactive%20Control%20Rel%20Stds%20RD17-7.pdf>

Page 1 FERC approved VAR-001-4.2 which “included the use of the term ‘Operations Planning’ instead of ‘Operational Planning’ throughout; modifications to several Measures; and grammatical corrections in Requirement R4.”

FERC Letter Order, Docket No. RD15-6-000 (Nov. 13, 2015).

<http://www.nerc.com/FilingsOrders/us/FERCOrdersRules/Letter_Order_Errata_20151113_RD15-6.pdf>

 Page 2 FERC approved VAR-001-4.1 which added the word “or” to R5, Part 5.3, between the words “schedules” and “Reactive.”

FERC Letter Order, Docket No. RD14-11-000 (Aug. 1, 2014).

<http://www.nerc.com/FilingsOrders/us/FERCOrdersRules/VAR%20Letter%20Order.pdf>

Page 2 FERC approved “Reliability Standard VAR-001-4 [which] requires each transmission operator to specify a system-wide voltage schedule as part of its plan to operate within system operating limits (SOLs) and interconnection reliability limits (IROLs), and to provide the voltage schedule to its reliability coordinator and adjacent transmission operators upon request. In addition, Reliability Standard VAR-001-4 requires each transmission operator to schedule sufficient reactive resources to regulate voltage levels, and operate or direct the operation of devices to regulate transmission voltage and reactive flows.”

**FERC Letter Order, Docket No. RD13-6-000 (June 20, 2013).**

[http://www.nerc.com/FilingsOrders/us/FERCOrdersRules/Petition%20for%20Approval%20of%20Proposed%20Reliability%20Standard%20VAR-001-3%20(WECC%20Variance).pdf](http://www.nerc.com/FilingsOrders/us/FERCOrdersRules/Petition%20for%20Approval%20of%20Proposed%20Reliability%20Standard%20VAR-001-3%20%28WECC%20Variance%29.pdf)

Pages 1-2 In the approval of VAR-001-3, FERC stated: “Requirement R3 would remain applicable to registered entities outside of WECC. The proposed Regional Variance [for WECC] requires Transmission operators to: (1) issue a choice of voltage schedules for each of the generating resources that are on-line and part of the bulk electric system in its area; (2) provide to Generator Operators a voltage schedule reference point; and (3) provide transmission equipment data and operating data requested by Generator Operators to support their set point conversion methodology.”

Page 2 In the approval, FERC also stated: “The Regional Variance contained in Proposed VAR-001-3 would require Transmission Operators [in WECC] to provide a voltage schedule to Generator Operators rather than making it optional as the continent-wide standard presently allows. Such schedules could be conveyed through a reactive power level, provided it is converted to a voltage level for the automatic voltage regulator’s automatic voltage control setting. This approach will enhance the voltage control for the Western Interconnection by requiring Generator Operators to convert the voltage schedule specified in proposed requirement E.A.13 into the voltage set point for the generator excitation system.”

**FERC Letter Order, Docket No.RD10-15-000 (Jan. 10, 2011).**

<http://www.nerc.com/FilingsOrders/us/FERCOrdersRules/1102011_order_stds.pdf>

P 4 FERC approved the revised Standard and found that NERC had “satisfied the Commission’s outstanding directives [regarding this Standard.]”

**Order No. 693.**

<http://www.nerc.com/FilingsOrders/us/FERCOrdersRules/ORDER%20693.pdf>

P 1847 FERC approved “Reliability Standard VAR-001-1 [which] requires transmission operators to implement formal policies for monitoring and controlling voltage levels, acquire sufficient reactive resources, specify criteria for generator voltage schedules, know the status of all transmission reactive power resources, operate or direct the operation of devices that regulate voltage and correct IROL or SOL violations resulting from reactive resource deficiencies. VAR-001-1 also requires purchasing-selling entities to arrange for reactive resources to satisfy their reactive requirements.”

Revision History for RSAW

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| **Version** | **Date** | **Reviewers** | **Revision Description** |
| 1 | 11/21/2017 | NERC Compliance Assurance, RSAW Task Force | New Document for consistency with the changes to newest version of approved Standard. |
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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 RSAW may provide 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 reserve the right to request additional evidence from the registered entity that is not included in this RSAW. This RSAW may include excerpts from FERC Orders and other regulatory references which 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. [↑](#footnote-ref-1)
2. Compliance Assessment Date(s): The date(s) the actual compliance assessment (on-site audit, off-site spot check, etc.) occurs. [↑](#footnote-ref-2)
3. 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. [↑](#endnote-ref-1)
4. *Mandatory Reliability Standards for the Bulk‐Power System*, 118 FERC ¶ 61,218 (2007) (“Order 693”). [↑](#footnote-ref-3)