

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

EOP-008-2 – Loss of Control Center Functionality

***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/PC** | **RC** | **RP** | **RSG** | **TO** | **TOP** | **TP** | **TSP** |
| **R1** | X |  |  |  |  | X |  |  |  | X |  |  |
| **R2** | X |  |  |  |  | X |  |  |  | X |  |  |
| **R3** |  |  |  |  |  | X |  |  |  |  |  |  |
| **R4** | X |  |  |  |  |  |  |  |  | X |  |  |
| **R5** | X |  |  |  |  | X |  |  |  | X |  |  |
| **R6** | X |  |  |  |  | X |  |  |  | X |  |  |
| **R7** | X |  |  |  |  | X |  |  |  | X |  |  |
| **R8** | X |  |  |  |  | X |  |  |  | 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** |  |  |  |
| **R7** |  |  |  |
| **R8** |  |  |  |

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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 Reliability Coordinator, Balancing Authority, and Transmission Operator shall have a current Operating Plan describing the manner in which it continues to meet its functional obligations with regard to the reliable operations of the BES in the event that its primary control center functionality is lost. This Operating Plan for backup functionality shall include:
	1. The location and method of implementation for providing backup functionality.
	2. A summary description of the elements required to support the backup functionality. These elements shall include:
		1. Tools and applications to ensure that System Operators have situational awareness of the BES.
		2. Data exchange capabilities.
		3. Interpersonal Communications.
		4. Power source(s).
		5. Physical and cyber security.
	3. An Operating Process for keeping the backup functionality consistent with the primary control center.
	4. Operating Procedures, including decision authority, for use in determining when to implement the Operating Plan for backup functionality.
	5. A transition period between the loss of primary control center functionality and the time to fully implement the backup functionality that is less than or equal to two hours.
	6. An Operating Process describing the actions to be taken during the transition period between the loss of primary control center functionality and the time to fully implement backup functionality elements identified in Requirement R1, Part 1.2. The Operating Process shall include:
		1. A list of all entities to notify when there is a change in operating locations.
		2. Actions to manage the risk to the BES during the transition from primary to backup functionality, as well as during outages of the primary or backup functionality.
		3. Identification of the roles for personnel involved during the initiation and implementation of the Operating Plan for backup functionality.
2. Each Reliability Coordinator, Balancing Authority, and Transmission Operator shall have a dated, current, and in effect Operating Plan for backup functionality in accordance with Requirement R1, in electronic or hardcopy format.

**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.**  |
| Dated, current, and in effect Operating Plan for backup functionality in electronic or hardcopy format |

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 EOP-008-2, R1

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

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|  | (R1) Verify that the Operating Plans for backup functionality specifically address each one of the following elements: |
|  | (Part 1.1) The location and method of implementation for providing backup functionality. |
|  | (Part 1.2) A summary description of the elements required to support the backup functionality. These elements shall include: |
|  | (Part 1.2.1) Tools and applications to ensure that System Operators have situational awareness of the BES. |
|  | (Part 1.2.2) Data exchange capabilities. |
|  | (Part 1.2.3) Interpersonal Communications. |
|  | (Part 1.2.4) Power source(s). |
|  | (Part 1.2.5) Physical and cyber security. |
|  | (Part 1.3) An Operating Process for keeping the backup functionality consistent with the primary control center. |
|  | (Part 1.4) Operating Procedures, including decision authority, for use in determining when to implement the Operating Plan for backup functionality. |
|  | (Part 1.5) A transition period between the loss of primary control center functionality and the time to fully implement the backup functionality that is less than or equal to two hours. |
|  | (Part 1.6) An Operating Process describing the actions to be taken during the transition period between the loss of primary control center functionality and the time to fully implement backup functionality elements identified in Requirement R1, Part1.2, that includes:: |
|  | (Part 1.6.1) A list of all entities to notify when there is a change in operating locations. |
|  | (Part 1.6.2) Actions to manage the risk to the BES during the transition from primary to backup functionality as well as during outages of the primary or backup functionality. |
|  | (Part 1.6.3) Identification of the roles for personnel involved during the initiation and implementation of the Operating Plan for backup functionality. |
| **Note to Auditor:**  |

Auditor Notes:

R2 Supporting Evidence and Documentation

1. Each Reliability Coordinator, Balancing Authority, and Transmission Operator shall have a copy of its current Operating Plan for backup functionality available at its primary control center and at the location providing backup functionality.
2. Each Reliability Coordinator, Balancing Authority, and Transmission Operator shall have a dated, current, and in effect copy of its Operating Plan for backup functionality in accordance with Requirement R2, in electronic or hardcopy format, available at its primary control center and at the location providing backup functionality.

**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.**  |
| Dated, current, and in effect copy of the entity’s Operating Plan for backup functionality |
| Dated evidence showing that the Operating Plan is available at the primary control center and at the location providing backup functionality. |

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 EOP-008-2, R2

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

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|  | (R2) Verify the entity has a copy of its current Operating Plan for backup functionality available at its primary control center. |
|  | (R2) Verify the entity has a copy of its current Operating Plan for backup functionality available at the location providing backup functionality. |
| **Note to Auditor:**  |

Auditor Notes:

R3 Supporting Evidence and Documentation

1. Each Reliability Coordinator shall have a backup control center facility (provided through its own dedicated backup facility or at another entity’s control center staffed with certified Reliability Coordinator operators when control has been transferred to the backup facility) that provides the functionality required for maintaining compliance with all Reliability Standards that are applicable to the primary control center functionality. To avoid requiring a tertiary facility, a backup facility is not required during:
* Planned outages of the primary or backup facilities of two weeks or less
* Unplanned outages of the primary or backup facilities
1. Each Reliability Coordinator shall provide dated evidence that it has a backup control center facility (provided through its own dedicated backup facility or at another entity’s control center staffed with certified Reliability Coordinator operators when control has been transferred to the backup facility) that provides the functionality required for maintaining compliance with all Reliability Standards that are applicable to the primary control center functionality in accordance with Requirement R3.

**Registered Entity Response (Required):**

**Question:** Did the entity have a planned outage of the primary or backup facilities of two weeks or more?

[ ]  Yes [ ]  No

If Yes, please identify the dates of the outage and the backup facilities that were used during the outage. [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 Requestedi:

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| **Provide the following evidence, or other evidence to demonstrate compliance.**  |
| Dated evidence showing the entity has a backup control center facility with the required functionality |

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 EOP-008-2, R3

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

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|  | (R3) Verify that the entity has a backup control center facility (of its own, or at another entity’s control center). |
|  | (R3) Verify the backup control center is staffed by Reliability Coordinator certified operators when control has been transferred to the backup center. |
|  | (R3) Verify the backup facility provides the functionality required for maintaining compliance with all Reliability Standards that are applicable to the primary control center functionality. |
| **Note to Auditor:**  |

Auditor Notes:

R4 Supporting Evidence and Documentation

1. Each Balancing Authority and Transmission Operator shall have backup functionality (provided either through a facility or contracted services staffed by applicable certified operators when control has been transferred to the backup functionality location) that includes monitoring, control, logging, and alarming sufficient for maintaining compliance with all Reliability Standards that are applicable to a Balancing Authority and Transmission Operator’s primary control center functionality. To avoid requiring tertiary functionality, backup functionality is not required during:
* Planned outages of the primary or backup facilities of two weeks or less
* Unplanned outages of the primary or backup facilities

**M4.**  Each Balancing Authority and Transmission Operator shall provide dated evidence that its backup functionality (provided either through a facility or contracted services staffed by applicable certified operators when control has been transferred to the backup functionality location) includes monitoring, control, logging, and alarming sufficient for maintaining compliance with all Reliability Standards that are applicable to a Balancing Authority or Transmission Operator’s primary control center functionality respectively in accordance with Requirement R4.

**Registered Entity Response (Required):**

**Question:** Did the entity have a planned outage of the primary or backup facilities of two weeks or more?

[ ]  Yes [ ]  No

If Yes, please identify the dates of the outage and the backup functionality that was used during the outage.

[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 Requestedi:

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| **Provide the following evidence, or other evidence to demonstrate compliance.**  |
| Dated evidence showing the entity has a backup control center facility with the required functionality |

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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Compliance Assessment Approach Specific to EOP-008-2, R4

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

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|  | (R4) Verify the entity’s backup control center contains the functionality as listed below sufficient for maintaining compliance with all Reliability Standards that depend on primary control center functionality for reliability of the BES: |
|  | (R4) Monitoring. |
|  | (R4) Control. |
|  | (R4) Logging. |
|  | (R4) Alarming. |
| **Note to Auditor:**  |

Auditor Notes:

R5 Supporting Evidence and Documentation

1. Each Reliability Coordinator, Balancing Authority, and Transmission Operator, shall annually review and approve its Operating Plan for backup functionality.
	1. An update and approval of the Operating Plan for backup functionality shall take place within sixty calendar days of any changes to any part of the Operating Plan described in Requirement R1.

**M5.** Each Reliability Coordinator, Balancing Authority, and Transmission Operator shall have evidence that its dated, current, and in effect Operating Plan for backup functionality, in electronic or hardcopy format, has been reviewed and approved annually and that it has been updated within sixty calendar days of any changes to any part of the Operating Plan described in Requirement R1 in accordance with Requirement R5.

**Registered Entity Response (Required):**

**Question:** Has the entity made changes to any part of the Operating Plan described in Requirement R1?

 [ ]  Yes [ ]  No

If Yes, provided a dated list of changes made to the Operating Plan. If No, describe how this was determined in the narrative section below.

[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 Requestedi:

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| **Provide the following evidence, or other evidence to demonstrate compliance.**  |
| The entity’s dated, current, and in effect Operating Plan for backup functionality, in electronic or hardcopy format |
| Evidence the entity updated and approved the Operating Plan for backup functionality within sixty calendar days of any changes to any part of the Operating Plan described in Requirement R1. |

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.** |
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Compliance Assessment Approach Specific to EOP-008-2, R5

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

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|  | (R5) Verify the entity annually reviewed, updated, and approved its backup functionality Operating Plan. |
|  | (Part 5.1) Verify updates and approvals of the Operating Plan took place within sixty calendar days of any changes to the Plan as described in R1. |
| **Note to Auditor:**  |

Auditor Notes:

R6 Supporting Evidence and Documentation

1. Each Reliability Coordinator, Balancing Authority, and Transmission Operator shall have primary and backup functionality that do not depend on each other for the control center functionality required to maintain compliance with Reliability Standards.

**M6.**  Each Reliability Coordinator, Balancing Authority, and Transmission Operator shall have dated evidence that its primary and backup functionality do not depend on each other for the control center functionality required to maintain compliance with Reliability Standards in accordance with Requirement R6.

**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.**  |
| Dated evidence the entity’s primary and backup functionality do not depend on each other for the control center functionality required to maintain compliance with Reliability Standards |

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.** |
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Compliance Assessment Approach Specific to EOP-008-2, R6

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

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|  | (R6) Verify that the primary and backup control center do not depend on each other for the control center functionality required to maintain compliance with Reliability Standards. |
| **Note to Auditor:**  |

Auditor Notes:

R7 Supporting Evidence and Documentation

1. Each Reliability Coordinator, Balancing Authority, and Transmission Operator shall conduct and document results on an annual test of its Operating Plan that demonstrates:
	1. The transition time between the simulated loss of primary control center functionality and the time to fully implement the backup functionality.
	2. The backup functionality for a minimum of two continuous hours.

**M7.** Each Reliability Coordinator, Balancing Authority, and Transmission Operator shall provide evidence such as dated records, that it has completed and documented its annual test of its Operating Plan for backup functionality, in accordance with Requirement R7.

**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 the entity has completed and documented its annual test of its Operating Plan for backup functionality. |

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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Compliance Assessment Approach Specific to EOP-008-2, R7

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

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|  | (R7)Verify the entity conducted a test of its Operating Plan annually and documented the results. |
|  | (Part 7.1) Verify the documented results of the tests demonstrate the time between the simulated loss of primary control center functionality and the time to fully implement backup functionality. |
|  | (Part 7.2) Verify the documented results of the tests demonstrate backup functionality for a minimum of two continuous hours. |
| **Note to Auditor:**  |

Auditor Notes:

R8 Supporting Evidence and Documentation

1. Each Reliability Coordinator, Balancing Authority, and Transmission Operator that has experienced a loss of its primary or backup functionality and that anticipates that the loss of primary or backup functionality will last for more than six calendar months shall provide a plan to its Regional Entity within six calendar months of the date when the functionality is lost, showing how it will re-establish primary or backup functionality.

**M8.**  Each Reliability Coordinator, Balancing Authority, and Transmission Operator that has experienced a loss of their primary or backup functionality and that anticipates that the loss of primary or backup functionality will last for more than six calendar months shall provide evidence that a plan has been submitted to its Regional Entity within six calendar months of the date when the functionality is lost showing how it will re-establish primary or backup functionality in accordance with Requirement R8.

**Registered Entity Response (Required):**

**Question:** Has the entity experienced a loss of primary or backup control center functionality during the audit period that was anticipated to last for more than six calendar months?

[ ]  Yes [ ]  No

If Yes, provide a dated list of instances in which the entity experienced a loss of its primary or backup functionality that was anticipated to last for more than six calendar months.

[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 Requestedi:

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| **Provide the following evidence, or other evidence to demonstrate compliance.**  |
| If applicable, evidence that a plan has been submitted to the entity’s Regional Entity within six calendar months of the date when the functionality was lost showing how the entity will re-establish primary or backup functionality |

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 EOP-008-2, R8

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

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|  | (R8) Verify the entity provided a plan to the Regional Entity detailing how it will re-establish primary or backup functionality within six calendar months of the date functionality is lost, for a loss of functionality anticipated to be more than six months. |
| **Note to Auditor:**  |

Auditor Notes:

Additional Information:

Reliability Standard



In addition to the Reliability Standard, there is an applicable Implementation Plan available on the NERC Web Site.

In addition to the Reliability Standard, there is background information available on the NERC Web Site.

Capitalized terms in the Reliability Standard refer to terms in the NERC Glossary, which may be found on the NERC Web Site.

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

FERC Order No. 840 paragraph 2: “…refining the required elements of an operating plan used to continue reliable operations of the bulk electric system in the event that primary control center functionality is lost (Reliability Standard EOP-008-2).”

FERC Order No. 840 paragraph 9: “The Commission determines that Reliability Standards EOP-005-3, EOP-006-3, and EOP-008-2 will enhance reliability by delineating the roles and responsibilities of entities that support system restoration from blackstart resources; clarifying the procedures and coordination requirements for reliability coordinator personnel to execute system restoration processes; and refining the contents of an operating plan used by reliability coordinators, balancing authorities, and transmission operators to maintain the reliability of the BES in the event that primary control center functionality is lost.”

Revision History for RSAW

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| **Version** | **Date** | **Reviewers** | **Revision Description** |
| 1 | 11/01/18 | NERC Compliance Assurance, RSAW Task Force | New Document |
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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)