

NERC

NORTH AMERICAN ELECTRIC
RELIABILITY CORPORATION

NERC Compliance Monitoring and Enforcement Program



2012 Implementation Plan

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NOTE:

CMEP Implementation Plan and the 2012 Actively Monitored Reliability Standards List are posted at: <http://www.nerc.com/commondocs.php?cd=3>

Important Note

Applicable Regulator: MRO used the NERC Compliance Monitoring and Enforcement Program 2012 Implementation Plan as a baseline document for development of the 2012 MRO Implementation Plan. The MRO plan is used across the U.S., Manitoba, and Saskatchewan, Canada. Any references to FERC as found in the NERC implementation plan do not apply in Manitoba and Saskatchewan, Canada.



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2012 MRO Implementation Plan

In the United States, NERC has delegated its compliance and enforcement authority to Midwest Reliability Organization (MRO) for the north central region of North America. MRO is the Cross Border Regional Entity (CBRE) assigned to monitor, assess, and enforce compliance of Registered Entities located within MRO's footprint in accordance with the approved delegation agreement. MRO has a Regional Delegation agreement with the province of Manitoba, Canada. Manitoba has enacted legislation and is in the process of adopting regulations, which will replace the Interim Working Agreement. MRO has a Memorandum of Understanding, which recognizes NERC Reliability Standards and authorizes compliance monitoring in the province of Saskatchewan. MRO may use its membership agreement and bylaws for compliance with other guidelines, which promote reliability.

The MRO Compliance Monitoring and Enforcement Program (CMEP) Implementation Plan (Implementation Plan) is a description of the annual compliance monitoring and enforcement activities to ensure MRO as a CBRE, fulfills its responsibilities under the NERC Delegation Agreement and other applicable obligations. The compliance monitoring enforcement activities are carried out by MRO staff. The MRO 2012 Implementation Plan supports the 2012 Electric Reliability Organization (ERO) CMEP.

Audit

MRO scheduled 18 compliance audits for 2012; eight of these Registered Entities have been audited once since June 18, 2007 and ten Registered Entities will be audited for the first time. Refer to the MRO website for the latest version of the 2012 audit calendar: [http://www.midwestreliability.org/02_compliance/audit_information/NERC MRO Consolidated Audits 2011r1.pdf](http://www.midwestreliability.org/02_compliance/audit_information/NERC_MRO_Consolidated_Audits_2011r1.pdf)

MRO will actively monitor the 50 Reliability Standards that are identified as high-risk priority standards by NERC. For the complete list of these high-risk Reliability Standards, please refer to Table 7 in the section "Reliability Standards Subject to 2012 CMEP Implementation" of the 2012 NERC Implementation Plan. MRO will actively monitor these Reliability Standards and requirements consistent with the NERC 2012 Actively Monitored Reliability Standards list: <http://www.nerc.com/commondocs.php?cd=3> MRO will not be including any regional Reliability Standards in the scope of audits conducted in 2012. The scope of the registered entities' compliance audits will include a review of all mitigation plans that are open during the audit.



2012 MRO Scheduled audits	
NCR01030	Southern Minnesota Municipal Power Agency (SMMPA)
NCR00674	Minnesota Power
NCR01003	Manitoba Hydro
NCR01013	Minnkota Power Cooperative
NCR00952	Wisconsin Public Service & UPPC
NCR00826	Midwest ISO - St. Paul
NCR00818	Madison Gas and Electric
NCR10102	Tri-State Generation and Transmission Assoc. (TSGT),
NCR00974	City of Grand Island, NE
NCR01042	Wisconsin Rapids Water Works & Lighting Commission
NCR00635	Tenaska Power Services Co
NCR00997	Hutchinson Utilities Commission
NCR00982	Escanaba Municipal Electric Utility
NCR00995	Heartland Consumers Power District
NCR00303	Municipal Energy Agency of Nebraska
NCR00999	Jo Carroll Energy
NCR11057	Vitol, Inc
NCR10017	Edison Mission Marketing and Trading

Spot Check

MRO will conduct spot checks in response to annual self certification, periodic data submittals, exception reporting, compliance assessments of system events, complaints, investigations and if identified, the need to expand an audit scope. MRO will create a public and non-public version of the Ops and Planning spot check report, while all CIP spot check reports will be non-public. MRO has not identified any mandatory spot checks in the 2012 Implementation Plan.

Self Certification

All Registered Entities in the MRO region are required to complete an annual self certification in the fall of 2012 for all requirements identified in the 2012 NERC Actively Monitored Reliability Standards list. Any entity preparing for audit or being audited during the fall self certification period will be offered the opportunity to self certify during a spring 2012 self certification period.

- Spring Self Certification: April 2-23, 2012
- Fall Self Certification: October 1-22, 2012

Self-Reporting

Registered Entities are encouraged to self-report any possible violations of Reliability Standards through webCDMS as soon as possible. MRO mitigation risk assessment staff will validate or



dismiss self-reported violations upon completion of their independent review. Self-reporting is one way of exhibiting internal controls and strong compliance program.

Periodic Data Submittals

MRO conducts periodic data submittals monthly, quarterly and on an annual basis. Data is collected by MRO Compliance Department, MRO Operations Department, Midwest Independent Transmission System Operator, Mid-Continent Area Power Pool, Southwest Power Pool or submitted by the Registered Entity directly to NERC based upon the individual Reliability Standard. A list of the periodic data submittals with instructions required by MRO can be found as Attachment 1 to this document.

Exception Reporting

Registered Entities are required to report by exception for the Reliability Standards identified by NERC in the 2012 NERC Reliability Standards Actively Monitored list. The list of Reliability Standards which are subject to exception reporting can be found as Attachment 2 to this document. The exception report template is available on the MRO website at: http://www.midwestreliability.org/COMP_guidelines.html.

Compliance Investigations

All regulatory authority approved Reliability Standards are subject to a compliance investigation. The CMEP Section 3.4 states: "A Compliance Investigation may be initiated at any time by the Compliance Enforcement Authority, NERC, FERC or another Applicable Governmental Authority in response to a system disturbance, Complaint, or possible violation of a Reliability Standard identified by any other means."

The Compliance Enforcement Authority (NERC or MRO) must notify the Registered Entity(s) and NERC within two (2) business days of the decision to initiate a Compliance Violation Investigation (CVI) and provide the initial scope of the investigation as required in CMEP 3.4.1. When warranted, MRO will utilize the Compliance Spot Check, and Compliance Investigation processes. Depending upon the facts and circumstances, and scope or size of an event, MRO may request NERC to lead the Compliance Investigation.

Complaints

MRO may receive complaints regarding alleged violations of regulatory approved Reliability Standards or requirements. MRO will conduct a review of each complaint it receives to determine if the complaint provides sufficient evidence for the issuance of a Spot Check, or Compliance Investigation.

NERC maintains a Compliance Hotline to receive complaints. Any person may submit a complaint to report a possible violation of a Reliability Standard by completing the [Compliance Hotline Form](#) available on the NERC website. Unless specifically authorized by the complainant,



NERC and MRO staff will withhold the name of the complainant in any communications with the subject entity. All information provided will be held as confidential in accordance with the NERC Rules of Procedure. The MRO compliance or enforcement staff will informally seek additional information from the submitter and others, as appropriate. The MRO compliance or enforcement staff may refer the matter for further investigation by NERC or the appropriate Regional Entity.

Complaints may also be made via phone by calling NERC at (609)524-7029 or by sending an e-mail directly to hotline@nerc.net.

System Events

MRO has clearly identified the separation of the event analysis and the assessment of compliance in response to system events. MRO compliance department works directly with the primary compliance contacts of the Registered Entities that have experienced a system event in order to facilitate a parallel assessment of compliance while the analysis of the event is underway. Upon completion of the assessment, the Registered Entity shall provide the results of their assessment to MRO and self-report any possible violations of NERC Reliability Standards if identified. MRO staff will review compliance assessment reports and validate the entity's assessment or issue a spot check for any items of concern, upon completion of the assessment MRO staff will provide the compliance assessment results to NERC.

MRO 2012 CMEP Key Initiatives

Through the stakeholder Compliance Committee, MRO staff is facilitating an ad hoc working group comprised of stakeholder representatives to provide practical guidance to the industry that bridges the gap between operational risk and compliance controls. . This will be achieved through the development of tools and processes to provide assurance in effectively maintaining compliance with NERC Reliability Standards on an on-going basis. This effort compliments NERC's Find-Fix-Track-Report (FFT) process by emphasizing the assurance of "finding" all potential infractions, no matter the materiality, and "fixing" them to prevent further escalation. The combination of strong internal assurance programs with prompt, effective corrective action programs will reduce operational risk for the region. MRO staff has deemed this initiative as "operationalizing compliance into reliability performance".

In 2012, MRO will evaluate a Registered Entity's internal controls structure, including procedures, to determine if management systems are in place and to assure that performance matches programs. For example, management of Registered Entities must have controls and procedures in place assure that work is conducted in accordance with procedures and, management must have an ability to demonstrate this assurance in order for MRO understand the potential risk posed by the Registered Entity. Better internal assurance programs, less risk posed. See example below:



Process	Control	Control Activity	Control Type
Program Documents and Procedures	Work Order	Checklist followed and completed, exceptions noted, follow-up notes signed	Primary Control
	Supervisory Review	Review for completeness and accuracy, follow-up actions closed or scheduled to be completed, signed	Secondary Control
	Management Oversight	Periodic sampling of work orders to determine program is being completed and properly reviewed	Assurance-Find It (Tertiary Control)

The transition to assessing compliance in the context of performance, or internal assurance programs, is the next step in becoming more risk based. Given the BES is a network of systems with many interdependencies; risk is more complex to manage. Embedding strong internal management assurance across the MRO region is the best way to manage such complex risk.

The issue of Generator Owners/Generator Operators (GO/GOP) has received a significant amount of attention directed at those entities who also may be Transmission Owners and/or Transmission Operators (TO/TOP). MRO will review the GO/GOPs who are not registered as a TO/TOP to ensure all facilities were identified during the facility registration process. MRO will continue its efforts to identify the owners of each asset in substations which have more than one asset owner.

Credentials and on-going training is essential to maintaining qualified personnel. MRO staff will maintain various industry certifications based upon their area of expertise and continue to provide its own training where necessary. Presently MRO staff include licensed professional engineers, NERC certified reliability authorities, certified compliance and ethics personnel, and individuals various IT audit and information security certifications.



2012 Enforcement

MRO's priority is to assure fair, reasonable, and timely enforcement determinations. MRO staff, in conjunction with NERC, is continuously reviewing ways to improve both speed and quality enforcement proceedings by streamlining processes, looking for more standardization, and prioritizing workload. Streamlined enforcement processes, specifically the Find, Fix, Track and Report (FFT Report) process and other process improvements are currently being implemented and will be monitored for efficiency gains throughout 2012.

MRO enforcement, and mitigation risk assessment staff performs substantive, independent reviews of findings including dismissals to assure fair, reasonable, and proper determinations. Achieving appropriate penalties and sanctions in a uniform manner is essential in consistent implementation of the CMEP.

Overall Process

MRO shall determine (i) whether there have been alleged violations of Reliability Standards by Registered Entities within the MRO area of responsibility, and (ii) if so, MRO will follow and implement the enforcement process steps as defined in the NERC (CMEP), Orders from regulatory authorities, and NERC guidance. Throughout 2012, MRO will take steps to streamline the process and provide more certainty sooner. MRO supports the development of alternative processes to resolve minor violations.

Possible violations (PVs) are identified through one of the eight discovery methods outlined in the CMEP. MRO enforcement staff will issue a Notice of Possible Violation (NOPV), which includes a data hold provision. PVs may become Alleged Violations or they may be scored and recorded under the FFT Report process. Upon validating a PV, the MRO enforcement staff prepares a Notice of Alleged Violation and Proposed Penalty or Sanction (NAVAPS). Upon acceptance by a Registered Entity of an Alleged Violation or the expiration of time for responding to the NAVAPS, a violation becomes a Confirmed Violation and the MRO enforcement staff prepares a Notice of Confirmed Violation (NOCV).

At any point in the process, a Registered Entity may request to enter into Settlement discussions. Upon receipt of a request for settlement, MRO enforcement Staff prepares an Acknowledgement of Request for Settlement. Upon reaching an agreement with a Registered Entity, MRO enforcement staff presents the Settlement Agreement to the MRO Hearing Body for approval.

Once a NOCV or Settlement Agreement is finalized, it is submitted to NERC. NERC staff finalizes a Notice of Penalty (NOP) for presentation to the NERC Board of Trustees (BOTCC). Upon approval of the BOTCC, the NOP is filed with the Commission and becomes publicly available. These [NOPs](#) are posted on the NERC website with links to the accompanying Orders approving



the actions. PVs processed under the FFT Report process are not subject to NOP filing, but are shared with FERC in an informational filing.

This process is different in the Canadian provinces. In Saskatchewan, the Saskatchewan Oversight Authority has the legislative authority to enforce compliance for the BES in the Province. Upon issuance by MRO of a Notice of Alleged Violation, the Saskatchewan Oversight Authority may make a finding that an Alleged Violation is a Confirmed Violation and seek and enforce a Mitigation Plan from the non-compliant entity. Financial penalties are not authorized and the violation information is only publicly disclosed with express written permission of Saskatchewan Oversight Authority.

In Manitoba, an Alleged Violation becomes a Confirmed Violation, and the Confirmed Violation and any applicable penalty, sanction and Mitigation Plan becomes effective in Manitoba, upon (i) issuance of an Order by the Public Utilities Board confirming these violations; and (ii) confirmation of the Order of the Public Utilities Board by The Manitoba Court of Appeal, or the earlier expiration of the deadline for filing an appeal to the Court of Appeal. NERC may make public a Confirmed Violation and the penalty or sanction for a confirmed violation in Manitoba.

MRO and NERC collaborate on enforcement and mitigation processes. NERC also performs substantive independent review for approval of the final enforcement actions (i.e. Notices of Confirmed Violation or Settlement Agreements) issued by MRO. Achieving appropriate penalties and sanctions in a uniform manner at all eight Regional Entities is essential in implementing the CMEP.

Settlement

Pursuant to CMEP 5.6, settlement negotiations may occur at any time, including prior to the issuance of a NAVAPS. All settlement discussions will be confidential until such time as NERC has approved a settlement agreement. The CMEP also provides that MRO shall require a Registered Entity to designate an individual responsible for negotiating on its behalf.

Settlements are viewed as an effective method to address Alleged Violations that posed a risk to reliability of the bulk power system. The MRO Board of Directors has delegated authority to the MRO Hearing Body to consider each Settlement Agreement negotiated by MRO staff. Upon approval of the MRO Hearing Body, Settlement Agreements will be executed and filed with NERC.

Mitigation Plans

Aggressive and thorough mitigation of any possible Alleged Violation is strongly encouraged. Mitigation Plans must be submitted using the compliance information system called "webCDMS." Submission of a Mitigation Plan is NOT an admission by a Registered Entity that a violation has occurred.



MRO mitigation risk assessment staff reviews all submitted Mitigation Plans and provides Registered Entities feedback on modifications required to support approval. A Mitigation Plan must specifically address the violation in question and describe specific actions to remedy the violation and prevent recurrence. Upon acceptance by MRO, Mitigation Plans are forwarded to NERC and to the Applicable Governmental Authority.

Upon completion of an approved Mitigation Plan, a Registered Entity is required to certify completion of mitigation and provide supporting evidence. MRO mitigation risk assessment staff will review the certification and supporting evidence and verify that each Mitigation Plan has been completed according to its specifications.

In the event that a Registered Entity fails to complete an approved Mitigation Plan, a new enforcement action may be initiated.

Hearings

A Registered Entity may choose to contest an Alleged Violation, proposed penalty, rejection of a Mitigation Plan, or remedial action directive and request a hearing. MRO has adopted the CMEP Hearing Procedures. The MRO Hearing Body has been established to hear any contested enforcement actions and will provide a final written decision to the Registered Entity and NERC consistent with the CMEP.

Reporting, Analysis & Tracking

MRO continues to improve and integrate the various compliance reporting platforms to streamline processing, tracking, and reporting of compliance and enforcement activity.

NERC and the Regional Entities review violations trends and patterns to address possible root causes, and provide ways to prevent future violations by sharing lessons learned and other meaningful information. The Compliance Analysis Reports have been completed and posted on the NERC Website at: <http://www.nerc.com/page.php?cid=3|329>



Attachment 1 - Periodic Data Submittals

NERC has identified specific Reliability Standards and requirements for Periodic Data Submittal in the 2012 program. The table below includes a list of the Reliability Standards designated to be monitored through Periodic Data Submittal and describes the process to be performed by MRO. Each data submittal described below has its own specific procedure and reporting process.

Reliability Standard	Title	Requirement	Applicable Function	Data Collection and Submittal Frequency	Data Collection Process
BAL-001-01.a	Real Power Balancing Control Performance	R1, R2	BA	Monthly	CPS1 and CPS2 data is collected from the applicable Registered Entities by the 10 th of each month and MRO submits the summary report to NERC by the 15 th of each month.
BAL-002-0	Disturbance Control Performance	R1 – R6	BA, RSG	Quarterly	DCS data is collected and assessed by the MISO-MB Hydro Contingency Reserve Sharing Group. MRO receives a summary report from the Reserve Group and submits the report to NERC. For the applicable Registered Entities located in Nebraska and Dakotas the DCS data is collected and assessed by the SPP Reserve Sharing Group. The SPP RE submits the summary report to NERC and provides a copy of the report to MRO. Saskatchewan Power Corporation submits its DCS data directly to MRO and MRO submits the summary report to NERC. The applicable Registered Entities are to submit their data by the 10 th of each month and MRO is required to submit the DCS summary report to NERC by the 15 th of the month following the end of the quarter.
BAL-003-01.b	Frequency Response and Bias	R1.2	BA	Annual	Data is collected annually by MRO operations department and submitted to NERC. The MRO compliance department receives a copy of the report. Due date December 31, 2012.
BAL-006-1	Inadvertent Interchange	R4, R4.1, R4.1.1 R4.1.2 R4.2	BA	Monthly	The BA's located in MRO submit this information directly to NERC via the NERC Inadvertent Interchange Web Tool. MRO compliance does not receive this information. Due the 15 th of each month (only when there is a dispute).



Reliability Standard	Title	Requirement	Applicable Function	Data Collection and Submittal Frequency	Data Collection Process
EOP-009-0	Documentation of Blackstart Generating Unit Test Results	R2	GO or GOP	Annual	Data is collected annually by MRO operations department and submitted to NERC. The MRO compliance department receives a copy of the report. Due date December 31, 2012.
FAC-003-1	Transmission Vegetation Management Program	R3, R4	TO	Continuous and Quarterly	Category 1 and 2 outages, as described in requirement 3.4, are self-reported (via webCDMS) at the time of occurrence. Category 3 outage information shall be reported at least quarterly upon receiving the reminder notice from MRO. MRO reports Category 1 and 2 outages to NERC as soon as they are discovered, and in addition submits a quarterly report to NERC.
MOD-010-0	Steady-State Data for Transmission System Modeling & Simulation	R1, R2	TO, TP, GO, RP	Annual	Data is collected by MRO operations department. MRO compliance department is notified of any non-submittal issue. Due dates December 16, 2011 – July 6, 2012. The MRO Model Building Schedule posted on the MRO website is the best and most current resource for identifying dues dates.
MOD-012-0	Dynamics Data for Transmission System Modeling & Simulation	R1, R2	TO, TP, GO, RP	Annual	Data is collected by MRO operations department. MRO compliance department is notified of any non-submittal issue. Due dates December 16, 2011 – July 6, 2012. The MRO Model Building Schedule posted on the MRO website is the best and most current resource for identifying dues dates.
MOD-017-0.1	Aggregated Actual and Forecast Demands and Net Energy for Load	R1.1	LSE, PA, RP	Annual	Data is collected by MRO operations department annually. MRO compliance department is notified of any non-submittal issue. Due date June 30, 2012.



Reliability Standard	Title	Requirement	Applicable Function	Data Collection and Submittal Frequency	Data Collection Process
PRC-004-1	Analysis and Mitigation of Transmission and Generation Protection System Misoperations	R3		Quarterly	Data is collected by MRO operations department. A copy of the quarterly report is provided to the MRO compliance staff. Quarterly data is required to be in by the last day of the 1 st month following the end of the quarter, as requested.
PRC-007-0	Assuring Consistency of Entity Underfrequency Load Shedding Programs with Regional Reliability Organization's Underfrequency Load Shedding Program Requirements	R2	TO, TOP, DP, LSE	Annual	Data is collected by MRO operations department. MRO compliance department is notified of any non-submittal issue. Early March 2012 (data request sent end of January 2012).
PRC-021-1	Under-Voltage Load Shedding Program Data	R1	TO, DP	Annual	Data is collected by MRO operations department. MRO compliance department is notified of any non-submittal issue. Early March 2012 (data request sent end of January 2012).
TPL-001-0.1	System Performance Under Normal Conditions	R3	PA, TP	Annual	The MISO, MAPP, and SPP Transmission Planners and Planning Authorities perform the data collections and assessments, and provide the study results and reports to MRO operations department upon request. MRO compliance department receives a copy of this information from the operations department.



Reliability Standard	Title	Requirement	Applicable Function	Data Collection and Submittal Frequency	Data Collection Process
TPL-002-0	System Performance Following Loss of a Single BES Element	R3	PA, TP	Annual	See TPL-001 response above.
TPL-003-0	System Performance Following Loss of Two or More BES Elements	R3	PA, TP	Annual	See TPL-001 response above.
TPL-004-0	System Performance Following Extreme BES Events	R2	PA, TP	Annual	See TPL-001 response above.



Attachment 2 - Exception Reporting

NERC has identified specific Reliability Standards and requirements to be monitored by the “Exception Report” method in the 2012 program. The table below includes a list of the Reliability Standards and requirements and identifies the process for Registered Entities to submit information. For certain items entities are directed to submit a self-report rather than the exception report. Depending upon the circumstances, MRO may issue a spot check following the receipt of an exception report. The [MRO Exception Reporting Form](#) is available on the MRO website.

Reliability Standard	Title	Requirement	Applicable Function	Data Collection and Submittal Frequency	Data Collection Process
BAL-003-01.b	Frequency Response and Bias	R1.2	BA	By exception	A change to a BA’s frequency bias setting that occurs after the annual submittal (see periodic data submittal section of this document) is reported to the MRO operations department, who will then submit the information to NERC. The MRO compliance department receives a copy of the report sent to NERC.
BAL-004-0	Time Error Correction	R4.1	BA	By exception	R4.1 Balancing Authorities that have reliability concerns with the execution of a Time Error Correction shall notify their Reliability Coordinator and request the termination of a Time Error Correction in progress. Balancing Authorities requesting the termination of a Time Error Correction shall notify the MRO compliance department by accessing the MRO Exception Report form via the MRO compliance web site and submitted to: mco@midwestreliability.org
BAL-006-1	Inadvertent Interchange	R5	BA	By exception	The BA’s located in the MRO submit this information directly to NERC via the NERC Inadvertent Interchange Web Tool. MRO compliance does not receive this information.
EOP-002-2.1	Capacity and Energy Emergencies	R9.2, R9.3, R9.4	RC	By exception	The RC that has implemented capacity and energy procedures and did not follow the criteria outlined in R9.2, R9.3, and R9.4 should report to its designated Lead Regional Entity by exception. Exception reporting to the MRO compliance department takes place by accessing the MRO Exception Report form via the MRO compliance web site and submitted to: mco@midwestreliability.org



Reliability Standard	Title	Requirement	Applicable Function	Data Collection and Submittal Frequency	Data Collection Process
EOP-004-1	Disturbance Reporting	R3, R3.1, R3.3, R4, R5	RC, BA, TOP, GOP, LSE	Event Driven	Entities are to provide a copy of the reportable incident (DOE or NERC IROL & Preliminary Disturbance Report Form) to: mco@midwestreliability.org
INT-001-3	Interchange Information	R1, R1.1, R1.2, R2, R2.1, R2.2	BA, PSE	Upon Request	Each Sink Balancing Authority shall have and provide upon request evidence that could include but is not limited to, Interchange Transaction tags, operator logs, voice recordings, or transcripts of voice recordings, electronic communications, computer printouts, or other equivalent evidence that will be used to confirm that Arranged Interchange was submitted to the Interchange Authority as specified in Requirements 2.1 and 2.2.
INT-003-3	Interchange Transaction Implementation	R1, R1.1, R1.1.1, R1.1.2, R1.2	BA	Upon request	The IA shall submit an exception report for any time the IA did not distribute to all BAs, TSPs and PSEs involved with a transaction whether or not the Arranged Interchange was confirmed.
IRO-004-2	Reliability Coordination – Operating Planning	R1	TOP, BA, TSP	By exception	Each BA, TOP, or TSP shall submit an exception report for any time the register entity did not comply with directives issued by the RC. The MRO Exception Report form can be accessed via the MRO compliance web site and submitted to: mco@midwestreliability.org
PER-003-0	Operating Personnel Credentials	R1, R1.1 R1.2 See D.1 of standard	BA, TOP, RC	Monthly reminder notice issued by MRO	MRO sends a monthly reminder notice to all applicable entities regarding the need to self-report any item of non-compliance.
PRC-016-0	Special Protection System Misoperations	R3	TO, or GO, or DP that owns an SPS	Quarterly	Data is collected by MRO operations department. A copy of the quarterly report is provided to the MRO compliance department.
TOP-005-2a	Operational Reliability Information	R1, R2, R3,	TOP, BA, RC, PSE	By exception	Applicable entities shall submit an exception report for any time operating reliability information is not being shared as agreed upon. The MRO Exception Report form can be accessed via the MRO compliance web site and submitted to: mco@midwestreliability.org



Reliability Standard	Title	Requirement	Applicable Function	Data Collection and Submittal Frequency	Data Collection Process
TOP-007-0	Reporting SOL & IROL Violations Evaluation	R1, R2, R4 (also see D1.1)	TOP, RC	By exception	<p>The RC shall submit an exception report any time an IROL violation exceeded 30-minutes, and any SOL violation that became an IROL violation because of changed system conditions that was not mitigated in 30-minutes.</p> <p>The MRO Exception Report form can be accessed via the MRO compliance web site and submitted to: mco@midwestreliability.org</p>

Revision History

Version	Date	Revision Description
1	10/28/2011	Developed MRO plan document from NERC Plan document
	10/31/2011	NERC approved MRO 2012 Implementation Plan