

Reclamation Manual

Policy

- Subject:** North American Electric Reliability Corporation (NERC) Electric Reliability Standard Compliance
- Purpose:** To establish the requirements to comply with the mandatory Reliability Standards of NERC and the Western Electricity Coordinating Council (WECC) and to establish an Electrical Reliability Compliance Program within the constraints of authorized resources. The benefits of the Policy to the Bureau of Reclamation are that compliance with the Reliability Standards minimizes the risk to the reliability of the bulk electric system (BES). The BES is vital to the welfare of the nation as well as essential for Reclamation to accomplish the agency mission.
- Authority:** The Reclamation Act of 1902 (Act of June 17, 1902, ch. 1093, 32 Stat. 388), the Town Sites and Power Development Act of 1906 (Act of April 16, 1906, ch. 1361, 34 Stat. 116), Federal Power Act of 1920 (Act of June 10, 1920, ch. 285, 41 Stat. 1063), Reclamation Project Act of 1939 (Act of August 4, 1939, ch. 418, 53 Stat. 1187), Energy Policy Act of 1992 (Act of October 24, 1992, 106 Stat. 2776), Energy Policy Act of 2005 (Act of August 8, 2005, 119 Stat. 594), and acts relating to individual dams or projects.
- Approving Official:** Commissioner
- Contact:** Senior Advisor, Hydropower, 86-61000
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1. **Introduction.** Historically, Reclamation has complied with applicable electric reliability criteria, policies, practices, and standards on a voluntary basis. However, under the provisions of Energy Policy Act of 2005 (Act), all users, owners, and operators of the BES must comply with the electric reliability requirements of the Act. Each applicable user, owner or operator of the BES must comply with Federal Energy Regulatory Commission (FERC) approved Reliability Standards developed by the NERC (18 CFR Part 40).
 - A. The Act directed FERC to appoint an Electric Reliability Organization (ERO) responsible for establishing and enforcing Reliability Standards for the BES. FERC finalized regulations which appointed NERC as the ERO and WECC as a Regional Reliability Organization with authority to develop regional standards. Subsequently, FERC has approved Reliability Standards developed by the NERC and WECC as mandatory and enforceable.
 - B. Reclamation must comply with the Reliability Standards developed by NERC and WECC and approved by FERC.
 - C. Reclamation has registered as a single entity Generator Owner (GO), Generator Operator (GOP), and Transmission Owner (TO).

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2. **Applicability.** This Policy applies to all Reclamation power and attendant facilities operated and maintained (O&M) directly by Reclamation staff to which the Reliability Standards apply. All Reclamation offices involved in power O&M processes are required to implement this Policy within the limits imposed on Reclamation by Federal laws, orders, and regulations, including limitations on the expenditure of Federal funds.
3. **Definitions.**
 - A. **Certifying.** For the purposes of this Policy, certifying means the act of attesting to the status of, or approving the information submitted.
 - B. **Directorate.** The organizational component of the director. This includes the Director, Technical Resources; regional directors; Director, Security, Safety, and Law Enforcement (SSLE); and Chief Information Office (CIO).
 - C. **Directors.** The Senior Executive responsible for specific programs or facilities. This definition includes: the Director, Technical Resources; regional directors; Director, SSLE; and Director, CIO.
 - D. **Electric Reliability Compliance Program.** The internal compliance program established through this Policy for managing a whole-organization compliance with Reliability Standards.
 - E. **Reliability Compliance.** The activities associated with requirements listed in Reliability Standards or rulings by FERC relative to the reliability of the BES.
 - F. **Reliability Standards.** Specific requirements applicable to Reclamation, defining tasks or procedures for maintaining reliability of the BES developed by WECC or through the NERC standards development process and approved by FERC.
4. **Responsibilities.**
 - A. **Commissioner.** The Commissioner has overall responsibility for compliance with Reliability Standards.
 - B. **Deputy Commissioner for Operations.** The Deputy Commissioner for Operations provides executive leadership and directs compliance with Reliability Standards, including coordination of the Electric Reliability Compliance Program matters with the other Deputy Commissioners.
 - C. **Director, Technical Resources.** The Director, Technical Resources provides executive level supervision of the Senior Advisor, Hydropower and provides technical resources as required to administer the Electric Reliability Compliance Program.

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- D. **Director, Chief Information Office.** The Director, CIO is responsible for ensuring and certifying that all aspects of Reclamation's Information Technology requirements and implementation comply with NERC, WECC, and other applicable Federal information technology standards, policy, and legislation.
 - E. **Technical Resources, Senior Advisor, Hydropower.** The Senior Advisor, Hydropower administers the Electric Reliability Compliance Program. Working with all responsible directors, the Senior Advisor, Hydropower certifies compliance as applicable to NERC and WECC and advises the Deputy Commissioner for Operations on the status of the Electric Reliability Compliance Program issues.
 - F. **Technical Resources, Power Resources Manager.** The Power Resources Manager provides coordination, advice, outreach, and oversight to all Reclamation organizations for the administration of the Electric Reliability Compliance Program.
 - G. **Directors.** Each director is responsible for the execution and documentation of all applicable NERC and WECC compliance activities, including the support and coordination of information technology related compliance requirements with the CIO. All such activities shall be focused on achieving, maintaining, and supporting demonstrable evidence of compliance with the Reliability Standards.
 - H. **Reliability Compliance Representative.** Each directorate is represented by a Reliability Compliance Representative who coordinates directorate compliance-related matters with the Power Resources Office and other directorates.
 - I. **Area Managers.** Area managers are responsible for performing and documenting activities within the area office to maintain or become compliant with all Reliability Standards.
5. **Electric Reliability Compliance Program.** Reclamation will administer the Electric Reliability Compliance Program to ensure compliance with Reliability Standards.