

Reclamation Manual

Directives and Standards

Subject:	North American Electric Reliability Corporation (NERC) Electric Reliability Standard Compliance
Purpose:	To establish the requirements for the Electric Reliability Compliance Program. The benefit of adhering to these requirements is ensuring the reliability of the Bureau of Reclamation's power facilities.
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), Department of Energy Act of 1977 (Act of August 4, 1977, Pub. L. 95-91, 91 Stat. 565), 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), acts relating to individual dams or projects.
Approving Official:	Senior Advisor, Hydropower
Contact:	Power Resources Office (PRO) (86-51000)

1. **Introduction.** Under the Energy Policy Act of 2005 (Act), all users, owners, and operators of the Bulk Electric System (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). Reclamation Policy FAC P13 states that Reclamation will comply with the Reliability Standards. Reclamation has registered as a single entity Generator Owner (GO), Generator Operator (GOP), and Transmission Owner (TO) for its five regions. This Directive and Standard (D&S) defines the requirements to achieve total integration of the referenced Policy, this D&S, and related procedures into the Reclamation hydropower operations and maintenance (O&M) processes.
2. **Applicability.** This D&S applies to all Reclamation power facilities operated and maintained directly by Reclamation staff to which the Reliability Standards apply. All Reclamation offices involved in power O&M processes are required to implement the Electric Reliability Compliance Program within the limits imposed on Reclamation by Federal laws, orders, and regulations, including limitations on the expenditure of Federal funds.
3. **Definitions.**
 - A. **Certifying.** The act of approving the information submitted to Western Electricity Coordinating Council (WECC), NERC or FERC during annual self-certifications, audits, and other compliance submissions.

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- B. **Directorate.** The organizational component of the director. This includes the Senior Advisor, Hydropower; regional directors; Director, Technical Services Center (TSC); Director, Safety, Security, and Law Enforcement (SSLE); and Director, Information Resources Office (IRO).
 - C. **Directors.** The Senior Executives responsible for specific programs or facilities. This includes the Senior Advisor, Hydropower; regional directors; Director, Technical Services Center (TSC); Director, Safety, Security, and Law Enforcement (SSLE); and Director, Information Resources Office (IRO).
 - D. **Electric Reliability Compliance Officer.** The Reclamation executive with delegated authority to administer and ensure Reclamation compliance with mandatory BES Reliability Standards, including signing related documents.
 - E. **Electric Reliability Compliance Program.** The internal compliance program for managing whole-organization compliance with Reliability Standards.
 - F. **Reliability Compliance.** The activities associated with requirements listed in Reliability Standards or rulings by FERC relative to the reliability of the BES.
 - G. **Reliability Standards.** Tasks or procedures for maintaining reliability of the BES developed by NERC or WECC through the standards development process and approved by FERC.
 - H. **Critical Infrastructure Protection (CIP) Senior Manager.** The Reclamation executive with overall responsibility and authority for leading and managing Reclamation's implementation of, and adherence to, NERC CIP Standards..
4. **Responsibilities.**
- A. **Commissioner.** The Commissioner has overall responsibility for compliance with Reliability Standards.
 - B. **Deputy Commissioner – Operations.** The Deputy Commissioner – Operations provides executive leadership and directs compliance with Reliability Standards, including coordination of Electric Reliability Compliance Program matters with the other Deputy Commissioners.
 - C. **Directors.** Each director is responsible for:
 - (1) ensuring maintenance and documentation of their directorate's procedures and evidence necessary for compliance with Reliability Standards;
 - (2) directing compliance with Reliability Standards at assigned facilities;

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- (3) ensuring the support and coordination of physical security, information protection and Information Technology-related compliance requirements with the SSLE and IRO; all such activities shall be focused on achieving and maintaining evidence of compliance with the subject Reliability Standards, including the design, installation, support, and coordination of all system under the purview of their offices;
- (4) ensuring adequate staffing and funding is available for Reliability Compliance related activities within the limits imposed on Reclamation by Federal laws, orders and regulations, including limitations on the expenditure of Federal funds;
- (5) encouraging compliance through Reliability Compliance performance plan elements for subordinate managers affiliated with activities supporting compliance;
- (6) designating a Reliability Compliance representative for the directorate with the authority to fulfill their duties; and
- (7) attesting compliance with Reliability Standards including approval of directorate mitigation plans to correct potential compliance violations.

D. Senior Advisor, Hydropower. The Senior Advisor, Hydropower, is responsible for:

- (1) representing Reclamation with WECC, NERC, and FERC in all Reliability Compliance related matters as the Electric Reliability Compliance Officer and CIP Senior Manager;
- (2) coordinating Reclamation's filings and responses to Reliability Compliance related matters with the appropriate director(s);
- (3) advising the Deputy Commissioner – Operations on Reliability Compliance matters including the results of all internal audits and status of compliance with Reliability Standards;
- (4) coordinating with the Office of the Solicitor on legal matters relating to Reliability Compliance;
- (5) certifying compliance with Reliability Standards, and submitting filings with NERC and FERC concerning Reliability Compliance related matters; and
- (6) encouraging compliance through Reliability Compliance performance plan elements for subordinate managers affiliated with activities supporting compliance.

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- E. **Area Managers.** Area managers with power facilities to which the Reliability Standards apply are responsible for:
- (1) complying with the Reliability Standards;
 - (2) ensuring the documentation is provided to the Reliability Compliance Representative within the required timeframe in support of Reliability Compliance filings;
 - (3) directing sufficient resources and funding to ensure compliance with Reliability Standards within the limits imposed on Reclamation by Federal laws, orders and regulations, including limitations on the expenditure of Federal funds;
 - (4) developing and implementing Reliability Compliance performance plan elements for staff affiliated with activities supporting compliance; and
 - (5) completing actions to correct potential compliance violations and prevent future violations.
- F. **Manager, PRO.** The Manager, PRO is responsible for:
- (1) consolidating directorate information relating to Reliability Compliance matters into comprehensive Reclamation filings and responses including preparing certification documents concerning Reliability Compliance related matters;
 - (2) preparing an annual status report for Reclamation management on Reliability Compliance activities;
 - (3) reporting to WECC on Reliability Compliance related matters;
 - (4) developing a Reclamation-wide Reliability Compliance outreach and training program;
 - (5) conducting annual audits of each directorate's compliance with Reliability Standards and investigating reports of potential Reliability Compliance violations and NERC reportable power incidents;
 - (6) coordinating FERC, NERC, and WECC audits, investigations, and reviews;
 - (7) participating in and serving as Chair of the Reliability Council and, in that capacity, reporting to the Senior Advisor, Hydropower on Reliability Compliance related matters;
 - (8) designating a Chair for the Reliability Workgroup;
 - (9) providing adequate resource support for the Reliability Workgroup;

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- (10) approving and disseminating Reclamation-wide guidance documents concerning Reliability Compliance;
- (11) coordinating Reclamation's participation on NERC and WECC Reliability Standards development workgroups and task forces;
- (12) in coordination with area managers and Reliability Compliance Representatives, preparing self-reports of non-compliance and mitigation plans; and
- (13) encouraging compliance through Reliability Compliance performance plan elements for subordinates affiliated with activities supporting compliance.

G. Reliability Council Members. Reliability Council members are the Manager, PRO, Reliability Compliance representatives from SSLE and IRO, and regional Power Managers. Reliability Council members are responsible for:

- (1) advising the director on Reliability Compliance matters, including providing periodic reports to the Senior Advisor Hydropower;
- (2) preparing directorate compliance documentation for director certification, including mitigation plans to correct potential compliance violations;
- (3) ensuring timely submission of directorate documentation in support of FERC, NERC, WECC, and internal audits, investigations, or reviews;
- (4) representing the directorate during compliance audits and evaluating and recommending actions associated with audit findings in coordination with area managers;
- (5) coordinating information among the various directorates and other interconnected entities or agencies involved in Reliability Compliance;
- (6) applying Reliability Standards to Reclamation power systems and providing reliability oversight;
- (7) developing the staffing and funding levels for maintaining compliance with Reliability Standards;
- (8) setting priorities and making strategic choices and decisions related to Reliability Standards;
- (9) reviewing, providing input, and recommending approval of Reclamation's Reliability Compliance guidance, outreach and training, and standards development activities; and

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- (10) designating a representative to participate at Reliability Workgroup meetings and acting on information presented from the Reclamation Reliability Workgroup regarding Reliability Compliance.

H. Supervisor, Electric Reliability Compliance. The Supervisor, Electric Reliability Compliance, is responsible for:

- (1) managing Reclamation's Reliability Compliance Program;
- (2) developing and managing the Reliability Compliance Training Program;
- (3) providing consistency and guidance in the application of FERC, NERC, and WECC Reliability Standards to Reclamation's Power O&M Program;
- (4) compiling and maintaining records of Reliability Compliance;
- (5) coordinating self-certification data;
- (6) serving as a liaison with FERC, NERC, and WECC;
- (7) coordinating Reliability Compliance standards development responses;
- (8) developing a strategic roadmap and monitoring procedures;
- (9) coordinating Reliability Compliance requirements with other Reclamation directorates;
- (10) providing support and resources for the Reliability Council;
- (11) participating in Reliability Compliance Decision Committees when needed; and
- (12) providing project management for technical document development within the Reliability Compliance Program.

I. Reliability Workgroup. Members of the Reliability Workgroup are designated by each director, who may designate one or more workgroup members as appropriate for the directorate. The Reliability Workgroup assembles and evaluates the information requested by the Reliability Council. The workgroup also independently conducts studies and evaluations of Reliability Compliance activities and reports findings to the Reliability Council. The Reliability Workgroup members are responsible for:

- (1) providing information to their respective Reliability Council Representative as requested;
- (2) coordinating directorate data assessments;

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- (3) reviewing and developing draft policies and procedures in support of Reliability Compliance;
 - (4) providing a forum for feedback and lessons learned; and
 - (5) monitoring compliance processes and procedures for consistency across directorates.
5. **Objectives.** The intent of the Electric Reliability Compliance Program is to achieve full compliance with the Reliability Standards through:
- A. developing compliance procedures and internal controls, and integrating those practices into Reclamation's power O&M program;
 - B. systematic and timely detection and remediation of violations including implementation of effective preventative measures;
 - C. assigning resources and funding to support administration, execution, and documentation of compliance efforts;
 - D. monitoring and evaluating the level of compliance with Reliability Standards; and
 - E. sharing information with other affected offices and entities.
6. **Funding.** Reliability Compliance activities are considered O&M and charged accordingly. Each directorate will fund its cost of participation in Reliability Compliance activities.

RECLAMATION MANUAL TRANSMITTAL SHEET

Effective Date: _____

Release No. _____

Ensure all employees needing this information are provided a copy of this release.

Reclamation Manual Release Number and Subject

Summary of Changes

NOTE: This Reclamation Manual release applies to all Reclamation employees. When an exclusive bargaining unit exists, changes to this release may be subject to the provisions of collective bargaining agreements.

Filing instructions

Remove Sheets

Insert Sheets

All Reclamation Manual releases are available at <http://www.usbr.gov/recman/>

Filed by: _____

Date: _____