
CITY OF ANAHEIM PUBLIC UTILITIES DEPARTMENT ORDER

501 – NORTH AMERICAN ELECTRIC RELIABILITY CORPORATION (NERC) AND WESTERN ELECTRICITY COORDINATING COUNCIL (WECC) INTERNAL COMPLIANCE PROGRAM

1. INTRODUCTION

1.1 Background and Purpose

To ensure that the energy needs of the Public Utilities Department of the City of Anaheim, California (hereinafter referred to as the “Department”) citizen-owners are met in a safe, efficient, and reliable manner, it is critical that all Department personnel have an understanding of, and appreciation for, the importance of adherence to the mandatory and enforceable Reliability Standards that are approved by the Federal Energy Regulatory Commission (FERC).

The purpose of this Internal Compliance Program (“Program”) is to document internal policies, procedures, and guidelines established to ensure the Department remains in compliance with mandatory and enforceable NERC and WECC Reliability Standards and to protect the reliability of the regional electric system. This Program delineates intra-Division compliance responsibilities and describes various internal compliance monitoring and enforcement measures that will be used to assess compliance with Reliability Standards and to ensure that compliance responsibilities are thoroughly understood on a Department-wide basis. The Department actively pursues opportunities to build compliance and learning into every business practice and to continuously improve its Program and to ensure that it is robust, rigorous, and transparent.

Department Management views compliance with the Reliability Standards as among its highest priorities. Delivering reliable energy to Anaheim customers means meeting, and even exceeding, minimum federal requirements for reliability, taking a proactive approach to compliance, continuously evaluating where the Department is in terms of regulatory compliance and where it can do better, and encouraging personnel throughout the Department to become actively involved in enhancing reliability. Program objectives are laid out to guide the organization’s activities so that they become a part of the organization’s compliance infrastructure, leading to a “culture of compliance”. Compliance with Reliability Standards is fully supported by the Department’s senior Management; therefore, it is essential that all Department employees understand the importance of compliance and the expectations of Department Management that employees fulfill their vital roles and responsibilities in achieving compliance.

1.2 Compliance Mission Statement

The Department’s compliance mission is to meet or exceed all applicable requirements, and implement best utility practices to encourage a culture of compliance and learning throughout the organization for the benefit of Anaheim residents and businesses.

2. APPLICABLE LEGAL, REGULATORY AND MUNICIPAL REQUIREMENTS

2.1 Legal and Regulatory Requirements

- The Federal Energy Regulatory Commission (FERC) under Section 215 of the Federal Power Act.

2.2 Municipal Requirements

- City of Anaheim Personnel Rules covering Management, Confidential, and Non-Represented Part-time Employees
- Management Pay Policies Covering Executive, Administrative, Middle Management, Supervisory and Professional Employees
- Memorandum of Understanding between the International Brotherhood of Electrical Workers, Local 47 and the City of Anaheim
- Administrative Regulation 223 – Performance Appraisals
- Department Order 171 – Records and Information Management
- Electric System Order 1514 – Sabotage Recognition and Reporting Procedures
- Electric System Order 2519 – Disturbance Reporting Procedure
- Electric System Order 2527 – Protection System Failure, Misoperation and Underfrequency Load Shedding Event Analysis, Mitigation and Reporting Procedure

Administrative Regulations:

Issued by the City Manager under authority of the City Charter and set forth and clarify the various administrative procedures and processes necessary for the efficient management of the City

Department Orders:

Administrative policies and procedures of the City of Anaheim Public Utilities Department

System Orders:

Technical policies and procedures of the City of Anaheim Public Utilities Department

3. RELIABILITY STANDARDS

3.1 Background

Under the Energy Policy Act of 2005 (EPAcT), Congress and the President determined, partly in response to the nationwide blackout that occurred in August 2003, that the reliability of the United States' electric system needed to be strengthened through a single, uniform set of standards that would be developed, implemented, and enforced on a federal level. For this reason, EPAcT contained provisions that required the FERC to approve a set of mandatory and enforceable Reliability Standards with which nearly all users, owners, and operators of the bulk electric system are obligated to comply. EPAcT also increased FERC's authority to impose financial penalties for violations of its regulations, including the Reliability Standards.

Following the passage of EPAcT, FERC approved one entity, NERC to act as the country's Electric Reliability Organization (ERO). As the ERO, NERC became responsible for developing and implementing the mandatory and enforceable Reliability Standards subject to FERC approval. NERC subsequently delegated some of its responsibilities for monitoring compliance with and enforcing the Reliability Standards to eight regional entities, one of which is WECC.

Shortly thereafter, FERC approved an initial set of mandatory and enforceable Reliability Standards that became effective on June 18, 2007. The Reliability Standards, which were previously voluntary, address many different areas of utility operations and apply to a wide array of different utility organizations. Although many utilities were already familiar with some of NERC's voluntary standards and satisfied them as a matter of good utility practice, once approved by FERC, compliance with the Reliability Standards is no longer a matter of choice. Currently, under FERC's mandatory and enforceable

Reliability Standards, most electric utilities throughout the United States must meet the requirements of the Reliability Standards or face the possibility of significant financial penalties.

3.2 How the Reliability Standards Impact the Department

The Reliability Standards apply to different categories of organizations depending upon the functions that are performed. The City of Anaheim is presently included in the “Compliance Registry,” which is a list maintained by NERC of all organizations that have been identified for compliance with the Reliability Standards, in the following functional categories:

- Distribution Provider (DP)
- Resource Planner (RP)

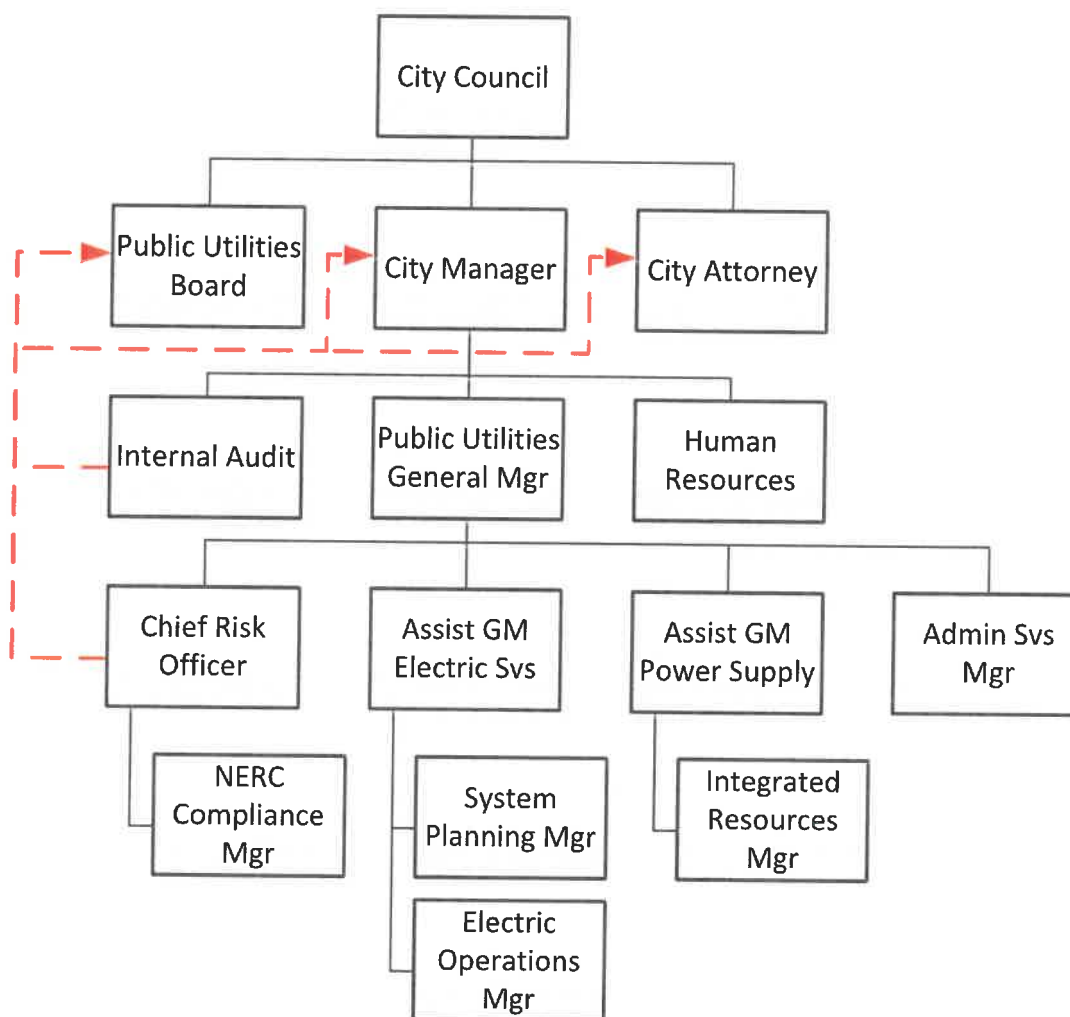
The Department is obligated to comply with all of the Reliability Standards that are applicable to the two functional categories listed above. To promote a culture of compliance, the Department has established an effective interface and internal communication program for all personnel who have direct responsibility for complying with the Reliability Standards. The following interface and outreach activities have been implemented:

- Regularly scheduled compliance meetings are held with all Department Managers having compliance responsibilities. During these meetings, compliance status reports are discussed, along with suggestions for enhancing the Department’s Program.
- Updates from NERC and WECC are distributed to personnel having compliance responsibilities. Personnel have the opportunity to ask questions and raise concerns.
- Information received from other entities having similar functional responsibilities to those of the Department is distributed to appropriate Division Managers and/or subject matter experts to provide support for the compliance work they are performing.

4. INTERNAL COMPLIANCE PROGRAM RESPONSIBILITIES

The Program is organized by the Department, and is structured to align with City governance and management. As Figure 1 depicts, multiple departments are included in the chain of command. Irrespective of the reporting structure, the ability to provide staff with direct access to the policy and City Executives is imperative. As such, the Chief Risk Officer, who serves as the Department’s Reliability Standards Compliance Monitoring and Enforcement Officer, has the ability to report any violations directly to the City Council appointed Public Utilities Board, City Manager, and/or the City Attorney. The City Manager may then set the City Council agenda to discuss the matter in compliance with the Brown Act. Similarly, the Internal Audit Division of the City of Anaheim has the ability to report any violations as indicated in Figure 1.

Figure 1. Internal Compliance Program Organizational Chart



4.1 Employee Reporting

Should any employee of the City of Anaheim wish to report a suspected violation of the Reliability Standards, they have direct access to the NERC Compliance Manager and/or Chief Risk Officer. Additionally, employees who wish to directly contact NERC may do so by calling 866-888-0451 or by sending an e-mail directly to hotline@nerc.net.

4.2 Division Responsibilities

The Program is structured with a compliance group that coordinates compliance efforts with Department managers and provides oversight at the Department level. The Chief Risk Officer manages the Enterprise Risk and Compliance Division, and has been assigned overall responsibility for the Reliability Standards and is designated as the Compliance Monitoring and Enforcement Officer. The Chief Risk Officer reports directly to the Public Utilities General Manager and provides compliance updates on a regular basis. The Enterprise Risk and Compliance Division is independent from the work groups responsible for complying with NERC Reliability Standards. In addition, to support the oversight effort, the City of Anaheim's (City) Internal Audit Division conducts annual internal audits of the Program.

The Assistant General Manager (AGM) Electric Services and AGM Power Supply are responsible for ensuring staff assigned to their work units perform the operational duties as required by the Reliability Standards. In addition, the AGM Electric Services serves as the Critical Infrastructure Protection (CIP) Senior Manager is responsible for implementing all CIP Standards and annually approving the list of Critical Assets and the list of Critical Cyber Assets.

As depicted in Figure 1, Electric Service and Power Supply Divisions are assigned the responsibility of performing the activities to ensure compliance with the Reliability Standards. The Electric Operations Manager and the Electric System Planning Manager report directly to the AGM Electric Services, and the Integrated Resources Manager reports to the AGM Power Supply. Each AGM has designated a NERC Liaison who is responsible for coordinating and documenting compliance with the Reliability Standards and reporting compliance matters to the NERC Compliance and Emergency Planning Manager. Specific staffing assignments are listed in Attachment A.

4.3 Public Utilities General Manager Responsibilities

1. Responsible executive for all compliance matters of the Department.
2. Reviews and approves Department policies and guidelines as set forth in Department Order 501.
3. Responsible for administering disciplinary actions in conjunction with the Human Resources Department for violations to personnel rules.

4.4 Chief Risk Officer (Reliability Standards Compliance Monitoring and Enforcement Officer – RSCM&E Officer) Responsibilities

1. Responsible for oversight and monitoring of the Department's Internal Compliance Program, including all Department-wide policies, procedures, and guidelines related to the Reliability Standards, in consultation with appropriate legal resources (described below) and relevant Assistant General Managers.
2. Modifies and recommends changes to the Department's Internal Compliance Program, as appropriate.
3. Reviews and signs all documentation related to Reliability Standards compliance that is transmitted to FERC, NERC, and/or WECC, or designates another person to carry out this responsibility.
4. Prepares reports and updates for presentation to the Public Utilities Board, City Manager, and/or City Council regarding Reliability Standards compliance matters.
5. Promptly reports violations, if any, of Reliability Standards to WECC and oversees development and implementation of Mitigation Plans on an expedited basis. Similarly responds to and addresses violations, if any, reported to the Department by WECC. Monitors progress of mitigation efforts and reports on such progress to WECC.
6. Identifies and documents any Reliability Standards violations and conducts investigations and prepares reports on investigatory findings to the Public Utilities General Manager.
7. Reviews reports prepared by legal and consulting resources and Department personnel regarding Reliability Standards compliance matters, including reports related to the status of compliance as assessed in connection with the Department's annual internal compliance review.
8. Directs development of appropriate policies, guidelines, and procedures in response to approval of new and/or modified Reliability Standards or Compliance Registry Criteria.
9. Communicates with FERC, NERC, and/or WECC regarding Reliability Standards compliance matters or delegates responsibility for doing so to another appropriate party (*e.g.*, a member of the Department's legal team or Division personnel).
10. Oversees the compliance registration/certification process on behalf of the Department.
11. Assigns personnel in Enterprise Risk and Compliance Division to administer, support, implement, and monitor Department activities related to Reliability Standards.

4.5 Assistant General Manager – Electric Services Responsibilities

1. Directs and manages compliance efforts within assigned areas of responsibility.

2. Ensures that resources are available to effectively accomplish tasks associated with Reliability Standards, and assigns staff to manage switching operations, system protection, cyber security, relay operations, and electric system reliability.
3. Serves as the CIP Senior Manager.

4.6 Assistant General Manager – Power Supply Responsibilities

1. Directs and manages compliance efforts within assigned areas of responsibility.
2. Ensures that resources are available to effectively accomplish tasks associated with mandatory reliability standards, and assigns staff to manage aggregated actual and forecast demands, interruptible demands and communications.

4.7 NERC Compliance and Emergency Planning Manager Responsibilities

Under the direction of the Chief Risk Officer:

1. Serves as the Primary Compliance Contact(s) for purposes of NERC/WECC Compliance Registry; forwards communications related to Reliability Standards compliance to appropriate Department personnel.
2. Responsible for coordinating the Program including the reviewing, drafting and/or compiling of documentation, reports and communications sent to or received from WECC, Peak Reliability, California Independent System Operator (CAISO), neighboring utilities and/or other parties in the Western Interconnection.
3. Manages the compliance registration/certification processes and documentation provided by subject matter experts related to compliance programs.
4. Schedules, coordinates and conducts quarterly compliance meetings for Department Management and subject matter experts, provides information regarding ongoing compliance activities to Department Management.
5. Manages the development and implementation of the annual overview awareness training related to NERC Reliability Standards, and the programs and practices used by the Department to demonstrate compliance.
6. Coordinates Department activities in preparation for and during internal and external audits and associated requests for information.

5. COMPLIANCE AUDITS

5.1 NERC/WECC Audits

Compliance audits are scheduled by NERC/WECC and conducted approximately every six years. Department staff will prepare for the audit under the direction of the Chief Risk Officer, who may retain consultants and/or external legal assistance to assist in preparing for the audit. Subject matter experts responsible for their respective areas of responsibility will be assigned to participate in the audit preparation and serve to address questions by the auditor.

5.2 Annual Internal Audits

Continuously assessing the Department's compliance with applicable Reliability Standards and evaluating ways in which the Program can be strengthened is a key objective of Department Management. On an annual basis, the Department will perform a formal review of the Program.

1. Independence

- a. Annual reviews will be conducted independently and the individuals performing the review will not be responsible for substantive compliance with the Reliability Standards being evaluated. Reviews may be performed by City staff from other Departments or by outside entities/consultants.

- b. The results of compliance reviews will be made available to the Chief Risk Officer, the General Manager and the City Attorney's Office and will not be subject to revision by Management or personnel that have been assigned responsibility for compliance with Reliability Standards.

2. Auditor Qualifications

Compliance reviews shall be performed by individuals who are knowledgeable regarding (i) the subject matter of the Reliability Standards being evaluated and (ii) possess an understanding of basic auditing principles and procedures.

6.0 COMPLIANCE TRAINING

6.1 Training Responsibility

Department Management recognizes that compliance training for Department personnel is critical, not only to instilling an organization-wide culture of compliance, but also ensuring that the Reliability Standards applicable to the Department's electric system are thoroughly understood from a substantive perspective by the individuals who are responsible for achieving compliance on a day-to-day basis. Thus, the Department is committed to providing training using the method appropriate for the audience and content. These methods include, but are not limited to, lecture, written, and electronic media. Training will also include relevant case studies of actual work activities that require awareness of compliance impacts, examples of prohibited activities and methods to ensure participants understanding of materials presented.

Department staff who administer contracts for services related to requirements covered by the Reliability Standards shall ensure that contractors and/or other vendors receive training required by the Standard or provide certification to the NERC Compliance and Emergency Planning Manager that their training meets or exceeds what is provided by the Department.

1. NERC Awareness Training

- a. The Department is committed to providing training in which the requirements of each of the Reliability Standards applicable to the Department are reviewed annually. This training is to be attended by all Department staff who have responsibility for the implementation of processes and or procedures used to demonstrate compliance with Reliability Standards.
- b. The objectives of this training session include the following:
 - 1) The training is intended to serve as a refresher for individuals who deal with different Reliability Standards, depending upon their role within the Department. Given the Department's size, individuals are likely responsible for only a portion of the overall Internal Compliance Program. A comprehensive, overview program will remind personnel of the overall universe of Reliability Standards applicable to the Department and allow for consideration of cross-division synergies and compliance strategies.
 - 2) Department Management believes that a stronger culture of compliance will evolve if personnel have a "big-picture" perspective of the Department's compliance responsibilities and the role of the Department's electric system in enhancing the overall reliability of the Western Interconnection.
- c. Awareness training shall be administered, managed and scheduled by the Enterprise Risk and Compliance Division, with assistance from the Administrative Services Manager.

2. New-Hire Training Responsibility

Division Managers:

- a. Assess newly hired individuals to determine what, if any, responsibilities a new staff member will have related to the Program, whether the new hire will be responsible for following any policies, procedures, and/or guidelines that implement Reliability Standards requirements, or if the new hire member will have other obligations related to Reliability Standards compliance,

- such as reporting responsibilities, involvement in any NERC, WECC, CAISO or other regional committees, working groups, or associations pertaining to the Reliability Standards.
- b. Determine on a case-by-case basis the level of initial training that is required, depending upon the particular circumstances and duties of the new employee.
 - c. Ensure that any initial training for new staff members involved in Reliability Standards compliance encompasses not only training in performing discrete tasks (for example, completing misoperations reports), but also training in the requirements of Reliability Standards related to the given task, the idea being that employees should have a broad understanding of the importance of compliance to the Department and, specifically, why certain tasks are performed. This training does not necessarily need to be formalized, although more formal training may occur at the discretion of Division Management, Assistant General Manager(s) or the Chief Risk Officer on an as-needed basis.

6.2 Information Distribution and Management

1. Required Reading Responsibilities
 - a. *Chief Risk Officer and/or designee* - May determine that it is appropriate to designate communications to employees as "Required Reading" when new or modified versions of Reliability Standards are approved, when the Department issues a new or revised version of its policies, procedures, or guidelines, or when Management needs to communicate information regarding the Reliability Standards to employees.
 - b. *NERC Compliance and Emergency Planning Manager* – Monitors industry trends and information provided by regulatory organizations and other entities and advises the Chief Risk Officer and Department staff regarding changes to Reliability Standards and associated programs.
 - c. *Designated employees* – Recipients of information designated as required reading shall confirm that they have reviewed that material. The NERC Compliance and Emergency Planning Manager shall document the distribution and confirmation of compliance with required reading.
2. Electronic Access to Reliability Standards
 - a. Employees who are assigned responsibilities for satisfying requirements contained in Reliability Standards and who may need to refer to the current versions of the Reliability Standards shall be notified during each bi-annual training of the NERC and WECC websites where currently-effective Reliability Standards (and related information) are posted.
3. Access to the Internal Compliance Program
 - a. *All Department personnel* – Employees shall be given access to this Program via the City's internal webpage (*Anaheim Insider*). Printed copies of the Program may be obtained by contacting the NERC Compliance and Emergency Planning Manager.
4. NERC Compliance Records
 - a. The NERC Compliance and Emergency Planning Manager shall maintain information regarding compliance deadlines (including deadlines for periodic reporting), event-driven reporting obligations and information received from or submitted to NERC and/or WECC.
 - b. Subject matter experts and Department staff assigned responsibilities associated with Reliability Standards shall maintain required records and provide evidence of compliance as needed.

7.0 RESPONSE TO POTENTIAL VIOLATIONS

7.1 Review of Possible or Potential Violations Responsibility

1. Any suspected violation shall be reported to the NERC Compliance Manager and the Chief Risk Officer, who will determine if there is a reasonable basis upon which to conclude that a violation has occurred or is occurring, in consultation with the City Attorney's Office.
 - a. If it is not clear that a violation has occurred or is occurring, then a self-report may be submitted together with an explanation of the need for further investigation to determine whether in fact a violation has occurred and, if so, the scope of the violation.

- b. If a possible or potential violation exists, the Chief Risk Officer or a designated member of Department staff shall submit to WECC a self-report (via the process established by WECC for the submittal of self-reports) of the possible or potential violation.
 - c. If it is clear that a violation has occurred or is continuing to occur, the Chief Risk Officer or his/her designee shall develop a Mitigation Plan, in consultation with the City Attorney's Office. The Mitigation Plan shall be submitted along with the self-report or shortly thereafter in accordance with the processes established by WECC for the submittal of such documents.
 - d. Shall designate one or more employees who shall be responsible for ensuring that the Mitigation Plan is completed and any reports required by WECC, NERC, and/or FERC are submitted in accordance with required deadlines.
 - e. Shall advise the Public Utilities General Manager, the respective AGM, and the Administrative Services Manager in the event of a violation or potential violation.
2. Investigation of Possible or Potential Violation
- a. The Chief Risk Officer will order an investigation to review all related processes, procedures, controls, and training programs related to the potential violation. A panel of experts not directly in the chain of command of any person suspected of a violation will be assembled, and an investigation shall be conducted expeditiously. A finding report will be prepared and reviewed by the Public Utilities General Manager, Chief Risk Officer, City Attorney's Office, and respective AGM.

8.0 EMPLOYEE PERFORMANCE AND COMPENSATION

8.1 Performance

The City has established through its City Charter authority the establishment of rules and administrative regulations to provide a fair and equitable system of personnel management in the municipal government. These rules set forth in detail those procedures which define the obligations, rights, privileges, benefits, and prohibitions which are placed upon all management, confidential and non-represented part-time employees of the City, as well as those employees who are represented by organized labor.

City policies have been established regarding the administration of performance appraisals for all full time and permanent, part-time City employees. These policies emphasize that regular, formal and informal feedback from supervisor to employee is critical to good job performance, including setting job standards and providing clear performance expectations. Tenure of employees covered by these rules shall be subject to good behavior, satisfactory work performance, necessity for the performance of work, and the availability of funds. Any employee may be suspended, reduced in salary, demoted or dismissed for good and sufficient cause, in consultation with the Administrative Services Manager and the Human Resources Department.

8.2 Employee Recognition

Employees demonstrating excellence in the administration of the initiatives that promote a healthy culture of NERC regulatory compliance are recognized in their performance evaluation and/or at the quarterly NERC Compliance meeting.

9.0 RELIABILITY COMPLIANCE RECORDS

9.1 Retention Policy

All major revisions of this document and all documents that constitute evidence demonstrating compliance with any federal, state, or local standard or law should be maintained in accordance with Department Order 171 – Records and Information Management.

9.2 Destruction Policy

Program documentation and records shall be maintained and destroyed in accordance with Department Order 171 – Records and Information Management. The NERC Compliance and Emergency Planning Manager shall, on an annual basis, perform a review of program documentation. Portions of this review may be delegated to relevant subject matter experts, at the discretion of the NERC Compliance and Emergency Planning Manager.

10. ATTACHMENTS

Attachments may be updated as necessary and do not constitute a change to this Department Order and do not require express approval by the Public Utilities Board.

11. REVISION HISTORY

Version	Change	By	Date
0	Prepared	Thompson Coburn LLP/ City Attorney's Office / Assistant General Manager – Electric Services	2.21.2008
0	Comments by Department training and safety staff incorporated	Thompson Coburn LLP	5.23.2008
0	Comments by USE Consulting Incorporated	Thompson Coburn LLP	10.3.2008
0	Comments by Department Staff	Kelly Nguyen	11.26.2008
0	Comments by City Attorney's Office	Assistant City Attorney	1.7.2009
0	Comments by Department Staff	Public Utilities Assistant General Manager – Electric Services	1.8.2009
1	Comments by Department Staff	Kelly Nguyen	7.2.2010
2	Renamed Electric System Order 1515 to Department Order 501, made changes in assignments following reorganization.	Dennis Schmidt	2.27.2013
3	Added Mission Statement; updated functional registration categories, paragraph numbering and Program Responsibilities, Added PUB Approval and Attachment A	Dennis Schmidt	5.20.2016

12. APPROVAL

Submitted:



Dukku Lee
Public Utilities General Manager

8/8/16

Date

Approved by the Public Utilities Board on July 27, 2016

ATTACHMENT A

Reliability Standard Responsibility Assignments

NERC Standard	Title	Responsible Subject Matter Expert
CIP-002	Critical Cyber Asset Identification	SCADA, Automation and Protection Manager
CIP-003	Security Management Controls	SCADA, Automation and Protection Manager
CIP-004	Cyber Security	SCADA, Automation and Protection Manager
COM-001	Communications	Electric Operations Manager
COM-001	Communications	Senior Integrated Resources Planner
EOP-004	Event Reporting	Electric Operations Manager
EOP-005	System Restoration from Blackstart Resources	Electric Operations Manager
FAC-002	Coordination of Plans for New Facilities	Senior Power System Planning Engineer
MOD-004	Capacity Benefit Margin	Senior Integrated Resources Planner
MOD-010	Steady-State Data for Transmission System Modeling and Simulation	Principal Power System Planning Engineer
MOD-012	Dynamics Data for Transmission System Modeling and Simulation	Principal Power System Planning Engineer
MOD-017	Aggregated Actual and Forecast Demands and Net Energy for Load	Senior Integrated Resources Planner
MOD-018	Reports of Actual and Forecast Demand Data	Senior Integrated Resources Planner
MOD-019	Forecasts of Interruptible Demands and Direct Control Load Management Data	Senior Integrated Resources Planner
MOD-020	Providing Interruptible Demands and Direct Control Load Management Data	Senior Integrated Resources Planner
MOD-021	Accounting Methodology for Effects of Demand-Side Management in Forecasts	Senior Integrated Resources Planner

ATTACHMENT A (continued)

Reliability Standard Responsibility Assignments

NERC Standard	Title	Responsible Subject Matter Expert
MOD-031	Demand and Energy Data	Senior Integrated Resources Planner
MOD-032	Data for Power System Modeling and Analysis	Principal Power System Planning Engineer
NUC-001	Nuclear Plant Interface Coordination	Senior Integrated Resources Planner
PRC-004	Analysis and Mitigation of Protection System Misoperations	SCADA, Automation and Protection Manager
PRC-005	Transmission and Generation Protection System Maintenance and Testing	Electric Field Superintendent - Substations
PRC-006	Automatic Underfrequency Load Shedding	SCADA, Automation and Protection Manager
PRC-008	Underfrequency Load Shedding Equipment Maintenance Programs	Electric Field Superintendent - Substations
PRC-010	Assessment of the Design and Effectiveness of UVLS Program	SCADA, Automation and Protection Manager
PRC-011	UVLS System Maintenance and Testing	SCADA, Automation and Protection Manager
PRC-015	Special Protection System Data and Documentation	SCADA, Automation and Protection Manager
PRC-016	Special Protection System Misoperations	SCADA, Automation and Protection Manager
PRC-017	Special Protection System Maintenance and Testing	SCADA, Automation and Protection Manager
PRC-021	Under-Voltage Load Shedding Program Data	SCADA, Automation and Protection Manager
PRC-022	Under-Voltage Load Shedding Program Performance	SCADA, Automation and Protection Manager
PRC-023	Transmission Relay Loadability	SCADA, Automation and Protection Manager
PRC-025	Generator Relay Loadability	SCADA, Automation and Protection Manager
TOP-001	Reliability Responsibilities and Authorities	Electric Operations Manager