

DRAFT Reliability Standard Audit Worksheet¹

MOD-001-2 – Modeling, Data, and Analysis – Available Transmission System Capability

This section to be completed by the Compliance Enforcement Authority.

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: Month DD, YYYY, to Month DD, YYYY
Compliance Monitoring Method: Audit
Names of Auditors: Supplied by CEA

Applicability of Requirements *[RSAW developer to insert correct applicability]*

| | BA | DP | GO | GOP | IA | LSE | PA | PSE | RC | RP | RSG | TO | TOP | TP | TSP |
|----|----|----|----|-----|----|-----|----|-----|----|----|-----|----|----------------|----|----------------|
| R1 | | | | | | | | | | | | | X ³ | | |
| R2 | | | | | | | | | | | | | | | X ³ |
| R3 | | | | | | | | | | | | | | | X ³ |
| R4 | | | | | | | | | | | | | X ³ | | |
| R5 | | | | | | | | | | | | | X ³ | | X ³ |
| R6 | | | | | | | | | | | | | X ³ | | X ³ |

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 NERC RSAW language contained within this document provides 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 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 reserves the right to request additional evidence from the registered entity that is not included in this RSAW. Additionally, this RSAW includes excerpts from FERC Orders and other regulatory references. The FERC Order cites 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.

² Compliance Assessment Date(s): The date(s) the actual compliance assessment (on-site audit, off-site spot check, etc.) occurs.

³ Functional Entities operating within the Electric Reliability Council of Texas (ERCOT) are exempt from MOD-001-2.

Subject Matter Experts

Identify Subject Matter Expert(s) responsible for this Reliability Standard. (Insert additional rows if necessary)

Registered Entity Response (Required):

| SME Name | Title | Organization | Requirement(s) |
|----------|-------|--------------|----------------|
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DRAFT

R1 Supporting Evidence and Documentation

- R1.** Each Transmission Operator that determines Total Flowgate Capability (TFC) or Total Transfer Capability (TTC) shall develop a written methodology (or methodologies) for determining TFC or TTC values. The methodology (or methodologies) shall reflect the Transmission Operator's current practices for determining TFC or TTC values.
- 1.1** Each methodology shall describe the method used to account for the following limitations in both the pre- and post-contingency state:
- 1.1.1** Facility ratings;
 - 1.1.2** System voltage limits;
 - 1.1.3** Transient stability limits;
 - 1.1.4** Voltage stability limits; and
 - 1.1.5** Other System Operating Limits (SOLs).
- 1.2** Each methodology shall describe the method used to account for each of the following elements, provided such elements impact the determination of TFC or TTC:
- 1.2.1** The simulation of transfers performed through the adjustment of generation, Load, or both;
 - 1.2.2** Transmission topology, including, but not limited to, additions and retirements;
 - 1.2.3** Expected transmission uses;
 - 1.2.4** Planned outages;
 - 1.2.5** Parallel path (loop flow) adjustments;
 - 1.2.6** Load forecast; and
 - 1.2.7** Generator dispatch, including, but not limited to, additions and retirements.
- 1.3** Each methodology shall describe the process for including any reliability-related constraints that are requested to be included by another Transmission Operator, provided that (1) the request references this specific requirement, and (2) the requesting Transmission Operator includes those constraints in its TFC or TTC determination.
- 1.3.1** Each Transmission Operator that uses the Flowgate Methodology shall include in its methodology an impact test process for including requested constraints. If a generator to Load transfer in a registered entity's area or a transfer to a neighboring registered entity impact the requested constraint by five percent or greater, the requested constraint shall be included in the TFC determination, otherwise the requested constraint is not required to be included.

1.3.2 Each Transmission Operator that uses the Area Interchange or Rated System Path Methodology shall describe the process it uses to account for requested constraints that have a five percent or greater distribution factor for a transfer between areas in the TTC determination; otherwise the requested constraint is not required to be included. When testing transfers involving the requesting Transmission Operators area, the requested constraint may be excluded.

1.3.3 A different method for determining whether requested constraints need to be included in the TFC or TTC determination may be used if agreed to by the Transmission Operators.

M1. Each Transmission Operator that determines TFC or TTC shall provide its current methodology (or methodologies) or other evidence (such as written documentation) to show that its methodology (or methodologies) contains the following:

- A description of the method used to account for the limits specified in part 1.1. Methods of accounting for these limits may include, but are not limited to, one or more of the following:
 - TFC or TTC being determined by one or more limits.
 - Simulation being used to find the maximum TFC or TTC that remains within the limit.
 - The application of a distribution factor in determining if a limit affects the TFC or TTC value.
 - Monitoring a subset of limits and a statement that those limits are expected to produce the most severe results.
 - A statement that the monitoring of a select limit(s) results in the TFC or TTC not exceeding another set of limits.
 - A statement that one or more of those limits are not applicable to the TFC or TTC determination.
- A description of the method used to account for the elements specified in part 1.2, provided such elements impact the determination of TFC or TTC. Methods of accounting for these elements may include, but are not limited to, one or more of the following:
 - A statement that the element is not accounted for since it does not affect the determination of TFC or TTC.
 - A description of how the element is used in the determination of TFC or TTC.
- (1.3) A copy of the request and a description of the method used to perform the impact test (1.3.1) or account for the requested constraints (1.3.2).
- The Transmission Operator shall also be using their current method to determine TFC or TTC. Evidence of this could be, but is not limited to, a demonstration that a selection of currently active TFC or TTC values were calculated based on the current methodology.

Registered Entity Response to General Compliance with this Requirement (Required):

Describe, in narrative form, how you meet compliance with this Requirement. Provide a brief explanation, in your own words, of how you meet compliance with this Requirement. References to supplied evidence, including links to the appropriate page, are recommended.

Evidence Requested⁴:

Provide the following evidence, or other evidence to demonstrate compliance. If the provisioning of this evidence is burdensome or otherwise unreasonable, contact your CEA to arrange for sampling or other means of reduction of the quantity of evidence submitted.

See M1 for evidence to demonstrate compliance.

See notes to auditor section when the TOP does not determine TFC or TTC values.

Registered Entity Evidence (Required):

The following information is recommended for all evidence submitted:

File Name, Document Title, Revision, Date, Page(s), Section(s), Section Title(s), Description

Also, evidence submitted should be highlighted and bookmarked, as appropriate, to identify the exact location where evidence of compliance may be found.

Audit Team Evidence Reviewed (This section to be completed by the Compliance Enforcement Authority):

Compliance Assessment Approach Specific to MOD-001-2, R1

This section to be completed by the Compliance Enforcement Authority

The RSAW Developer will complete this section with a set of detailed steps for the audit process. See the RSAW Developer’s Guide for more information.

Review the methodology (or methodologies or other evidence per M1) and determine whether it addresses all the sub-requirements of Requirement R1.

Note to Auditor: With regard to “current” practices, the auditor may at their discretion ask for a live demonstration during the audit of currently determined values, or may ask for written evidence that demonstrates the values were calculated based on the current practice, or both.

⁴ 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.

Although a registered entity may meet the registration criteria to be registered as a Transmission Operator, there are instances where that Transmission Operator does not determine TFC or TTC values. In these instances, as the registered entity does not determine these values, it would therefore not be required to fulfill the requirements.

An auditor will first come to an understanding of how the entity operates and whether they determine TFC or TTC. In the event that it is clear to the auditor that the entity does not determine TFC or TTC, this will be sufficient evidence for the auditor that the appropriate requirements are not applicable to that entity. If questions remain after this verification, the auditor could look to neighboring entities for confirmation.

Auditor Notes:

R2 Supporting Evidence and Documentation

- R2.** Each Transmission Service Provider that determines Available Flowgate Capability (AFC) or Available Transfer Capability (ATC) shall develop an Available Transfer Capability Implementation Document (ATCID) that describes the methodology (or methodologies) it uses to determine AFC or ATC values. The methodology (or methodologies) shall reflect the Transmission Service Provider's current practices for determining AFC or ATC values. Each methodology shall describe the method used to account for the following elements that impact the determination of AFC or ATC:
- 2.1.** Each methodology shall describe the method used to account for the following elements that impact the determination of AFC or ATC:
- 2.1.1.** The simulation of transfers performed through the adjustment of generation, Load, or both;
 - 2.1.2.** Transmission topology, including, but not limited to, additions and retirements;
 - 2.1.3.** Expected transmission uses;
 - 2.1.4.** Planned outages;
 - 2.1.5.** Parallel path (loop flow) adjustments;
 - 2.1.6.** Load forecast; and
 - 2.1.7.** Generator dispatch, including, but not limited to, additions and retirements.
- 2.2.** Each Transmission Service Provider that uses the Flowgate Methodology shall, for reliability constraints identified in part 1.3, use the AFC determined by the Transmission Service Provider for that constraint.

- M2.** Each Transmission Service Provider that determines AFC or ATC shall provide its current ATCID or other evidence (such as written documentation) to show that its ATCID contains the following:
- A description of the method used to account for the elements specified in part 2.1, provided such elements impact the determination of AFC or ATC. Methods of accounting for these elements may include, but are not limited to, one or more of the following:
 - A description of how the element is used in the determination of AFC or ATC.
 - A statement that the element is not accounted for since it does not affect the determination of AFC or ATC.
 - A statement that the element is accounted for in the determination of TFC or TTC by the Transmission Operator, and does not otherwise affect the determination of AFC or ATC.
 - Each Transmission Service Provider that uses the Flowgate Methodology shall provide a description of the method in which AFC provided by another Transmission Service Provider was used for the reliability constraints identified in part 1.3.
 - The Transmission Service Provider shall also be using their current method to determine AFC or ATC. Evidence of this could be, but is not limited to, a demonstration that a selection of currently active AFC or ATC values were calculated based on the current methodology.

Registered Entity Response to General Compliance with this Requirement (Required):

Describe, in narrative form, how you meet compliance with this Requirement. Provide a brief explanation, in your own words, of how you meet compliance with this Requirement. References to supplied evidence, including links to the appropriate page, are recommended.

Evidence Requested⁵:

Provide the following evidence, or other evidence to demonstrate compliance. If the provisioning of this evidence is burdensome or otherwise unreasonable, contact your CEA to arrange for sampling or other means of reduction of the quantity of evidence submitted.

See M2 for evidence to demonstrate compliance.

See notes to auditor section when the TSP does not determine AFC or ATC values.

Registered Entity Evidence (Required):

The following information is recommended for all evidence submitted:

File Name, Document Title, Revision, Date, Page(s), Section(s), Section Title(s), Description

⁵ 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.

Also, evidence submitted should be highlighted and bookmarked, as appropriate, to identify the exact location where evidence of compliance may be found.

Audit Team Evidence Reviewed (This section to be completed by the Compliance Enforcement Authority):

Compliance Assessment Approach Specific to MOD-001-2, R2

This section to be completed by the Compliance Enforcement Authority

The RSAW Developer will complete this section with a set of detailed steps for the audit process. See the RSAW Developer's Guide for more information.

Review the methodology (or methodologies or other evidence per M2) and determine whether it addresses all the sub-requirements of Requirement R2.

Note to Auditor: With regard to "current" practices, the auditor may at their discretion ask for a live demonstration during the audit of currently determined values, or may ask for written evidence that demonstrates the values were calculated based on the current practice, or both.

Although a registered entity may meet the registration criteria to be registered as a Transmission Service Provider, there are instances where that Transmission Service Provider does not determine AFC or ATC. In these instances, as the registered entity does not determine these values, it would therefore not be required to fulfill the requirements.

An auditor will first come to an understanding of how the entity operates and whether they determine AFC or ATC. In the event that it is clear to the auditor that the entity does not determine AFC or ATC, this will be sufficient evidence for the auditor that the appropriate requirements are not applicable to that entity. If questions remain after this verification, the auditor could look to neighboring entities for confirmation.

Auditor Notes:

R3 Supporting Evidence and Documentation

- R3.** Each Transmission Service Provider that determines Capacity Benefit Margin (CBM) values shall develop a Capacity Benefit Margin Implementation Document (CBMID) that describes its method for establishing CBM. The method described in the CBMID shall reflect the Transmission Service Provider's current practices for determining CBM values.

DRAFT NERC Reliability Standard Audit Worksheet

Audit ID: Audit ID if available; or NCRnnnnn-YYYYMMDD

RSAW Version: RSAW_MOD-001-2_2013_v1 Revision Date: [October 31, 2013](#)

M3. Each Transmission Service Provider that determines CBM shall provide evidence, including, but not limited to, its current CBMID, current CBM values, or other evidence (such as written documentation, study reports, or supporting information) to demonstrate that it established CBM values consistent with its methodology described in the CBMID. If a Transmission Service Provider does not maintain CBM, examples of evidence include, but are not limited to, an affidavit, statement, or other documentation that states the Transmission Service Provider does not maintain CBM.

Registered Entity Response to General Compliance with this Requirement (Required):

Describe, in narrative form, how you meet compliance with this Requirement. Provide a brief explanation, in your own words, of how you meet compliance with this Requirement. References to supplied evidence, including links to the appropriate page, are recommended.

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Evidence Requested⁶:

Provide the following evidence, or other evidence to demonstrate compliance. If the provisioning of this evidence is burdensome or otherwise unreasonable, contact your CEA to arrange for sampling or other means of reduction of the quantity of evidence submitted.

See M3 for evidence to demonstrate compliance.

See notes to auditor section when the TSP does not determine CBM values.

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Registered Entity Evidence (Required):

The following information is recommended for all evidence submitted:

File Name, Document Title, Revision, Date, Page(s), Section(s), Section Title(s), Description

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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Audit Team Evidence Reviewed (This section to be completed by the Compliance Enforcement Authority):

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⁶ 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.

Compliance Assessment Approach Specific to MOD-001-2, R3

This section to be completed by the Compliance Enforcement Authority

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| | The RSAW Developer will complete this section with a set of detailed steps for the audit process. See the RSAW Developer's Guide for more information. |
| | Review evidence and determine whether it describes the entity's current method for establishing CBM. |

Note to Auditor: In cases where a registered entity asserts it does not determine CBM, this requirement is not applicable. An auditor could use his or her knowledge of the entity and the BES in its area, obtained through general knowledge or research conducted prior to the audit, to assess the reasonableness of this claim. An auditor could also obtain an attestation that the registered entity does not determine CBM and may further look into the registered entity's ATC equations for previously determined values to see that CBM was not determined.

This approach to compliance assessment is supported in FERC Order 729 at P 298, FERC stated, "though MOD-004-1 [CBM] is not as explicit with regard to its applicability, we believe that its applicability is implicitly reserved to those entities that maintain capacity benefit margin. Thus, it does not appear that Entergy, or any other entity, would be in violation of MOD-004-1 [CBM] or MOD-008-1 [TRM] if it does not maintain transmission reliability margin or capacity benefit margin."

Auditor Notes:

R4 Supporting Evidence and Documentation

- R4.** Each Transmission Operator that determines Transmission Reliability Margin (TRM) values shall develop a Transmission Reliability Margin Implementation Document (TRMID) that describes its method for establishing TRM. The method described in the TRMID shall reflect the Transmission Operator's current practices for determining TRM values.
- M4.** Each Transmission Operator that determines TRM shall provide evidence including, but not limited to, its current TRMID, current TRM values, or other evidence (such as written documentation, study reports, or supporting information) to demonstrate that it established TRM values consistent with its methodology described in the TRMID. If a Transmission Operator does not maintain TRM, examples of evidence include, but are not limited to, an affidavit, statement, or other documentation that states the Transmission Operator does not maintain TRM.

Registered Entity Response to General Compliance with this Requirement (Required):

Describe, in narrative form, how you meet compliance with this Requirement. Provide a brief explanation, in your own words, of how you meet compliance with this Requirement. References to supplied evidence, including links to the appropriate page, are recommended.

DRAFT NERC Reliability Standard Audit Worksheet

Audit ID: Audit ID if available; or NCRnnnnn-YYYYMMDD

RSAW Version: RSAW_MOD-001-2_2013_v1 Revision Date: [October 31, 2013](#)

Evidence Requested⁷:

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| Provide the following evidence, or other evidence to demonstrate compliance. If the provisioning of this evidence is burdensome or otherwise unreasonable, contact your CEA to arrange for sampling or other means of reduction of the quantity of evidence submitted. |
| See M4 for evidence to demonstrate compliance. |
| See notes to auditor section when the TOP does not determine TRM values. |
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Registered Entity Evidence (Required):

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| The following information is recommended for all evidence submitted: File Name, Document Title, Revision, Date, Page(s), Section(s), Section Title(s), Description 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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Audit Team Evidence Reviewed (This section to be completed by the Compliance Enforcement Authority):

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Compliance Assessment Approach Specific to MOD-001-2, R4

This section to be completed by the Compliance Enforcement Authority

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| | The RSAW Developer will complete this section with a set of detailed steps for the audit process. See the RSAW Developer’s Guide for more information. |
| | Review evidence and determine whether it describes the entity’s current method for establishing TRM. |

Note to Auditor: In cases where a registered entity asserts it does not determine TRM, this requirement is not applicable. An auditor could use his or her knowledge of the entity and the BES in its area, obtained through general knowledge or research conducted prior to the audit, to assess the reasonableness of this claim. An auditor could also obtain an attestation that the registered entity does not determine TRM, and may further investigate the registered entity’s ATC equations for previously determined values to see that TRM was not determined. If the Transmission Operator is not a Transmission Service Provider, then the Transmission Service Provider that uses the Transmission Operator’s TFC or TTC Values (if there is one) can be contacted (at the auditor’s discretion) to confirm they do not use a TRM provided by the Transmission Operator.

⁷ 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.

This approach to compliance assessment is supported in FERC Order 729 at P 298, FERC stated, “though MOD-004-1 [CBM] is not as explicit with regard to its applicability, we believe that its applicability is implicitly reserved to those entities that maintain capacity benefit margin. Thus, it does not appear that Entergy, or any other entity, would be in violation of MOD-004-1 [CBM] or MOD-008-1 [TRM] if it does not maintain transmission reliability margin or capacity benefit margin.”

Auditor Notes:

R5 Supporting Evidence and Documentation

- R5.** Within 45 calendar days of receiving a written request that references this specific requirement from a Planning Coordinator, Reliability Coordinator, Transmission Operator, Transmission Planner, Transmission Service Provider, or any other registered entity that demonstrates a reliability need, each Transmission Operator or Transmission Service Provider shall provide:
- 5.1.** A written response to any request for clarification of its TFC or TTC methodology, ATCID, CBMID, or TRMID. If the request for clarification is contrary to the Transmission Operator’s or Transmission Service Provider’s confidentiality, regulatory, or security requirements then a written response shall be provided explaining the clarifications not provided, on what basis and whether there are any options for resolving any of the confidentiality, regulatory, or security concerns.
 - 5.2.** If not publicly posted on OASIS or its company website, the Transmission Operator’s effective:
 - 5.2.1** TRMID; and
 - 5.2.2** TFC or TTC methodology.
 - 5.3.** If not publicly posted on OASIS or its company website, the Transmission Service Provider’s effective:
 - 5.3.1** ATCID; and
 - 5.3.2** CBMID.
- M5.** Examples of evidence include, but are not limited to:
- Dated records of the request and the Transmission Operator’s or Transmission Service Provider’s response to the request;
 - A statement by the Transmission Operator or Transmission Service Provider that they have received no requests; or

- A statement by the Transmission Operator or Transmission Service Provider that they do not determine one or more of these values: AFC, ATC, CBM, TFC, TTC or TRM.

Registered Entity Response to General Compliance with this Requirement (Required):

Describe, in narrative form, how you meet compliance with this Requirement. Provide a brief explanation, in your own words, of how you meet compliance with this Requirement. References to supplied evidence, including links to the appropriate page, are recommended.

Evidence Requested⁸:

Provide the following evidence, or other evidence to demonstrate compliance. If the provisioning of this evidence is burdensome or otherwise unreasonable, contact your CEA to arrange for sampling or other means of reduction of the quantity of evidence submitted.

See M5 for evidence to demonstrate compliance.

Registered Entity Evidence (Required):

The following information is recommended for all evidence submitted:

File Name, Document Title, Revision, Date, Page(s), Section(s), Section Title(s), Description

Also, evidence submitted should be highlighted and bookmarked, as appropriate, to identify the exact location where evidence of compliance may be found.

Audit Team Evidence Reviewed (This section to be completed by the Compliance Enforcement Authority):

Compliance Assessment Approach Specific to MOD-001-2, R5

This section to be completed by the Compliance Enforcement Authority

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| | The RSAW Developer will complete this section with a set of detailed steps for the audit process. See the RSAW Developer’s Guide for more information. |
| | Through either discussions with the entity under audit or other Planning Coordinators, Reliability |

⁸ 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.

Coordinators, Transmission Operators, Transmission Planners, Transmission Service Providers, or any combination thereof, determine if a request was made in accordance with parts 5.1 through 5.3. If such a request was made, then determine that the entity under audit responded in accordance with parts 5.1 through 5.3 within 45 calendar days from receipt of the request.

Note to Auditor: In general, evidence obtained from independent third parties is stronger than assertions from the entity under audit. However, based upon the auditor’s perception of the risk of this requirement to the BES and the entity’s management practices (or internal controls) a simple assertion may provide sufficient evidence of compliance in many cases.

The aforementioned 45 day time period begins on the day when the written request was received by the entity. Dated emails would constitute one example of appropriate evidence of receipt and response under this requirement.

Auditor Notes:

R6 Supporting Evidence and Documentation

- R6.** Each Transmission Operator or Transmission Service Provider that receives a written request from another Transmission Operator or Transmission Service Provider for data related to AFC, ATC, TFC, or TTC determinations that (1) references this specific requirement, and (2) specifies that the requested data is for use in the requesting party’s AFC, ATC, TFC, or TTC determination shall take one of the actions below. [*Violation Risk Factor: Lower*] [*Time Horizon: Operations Planning*]
 - 6.1.** In responding to a written request for data on an ongoing basis, the Transmission Service Provider or Transmission Operator shall make available its data on an ongoing basis no later than 45 days from receipt of the written request. Unless otherwise agreed upon, the Transmission Operator or Transmission Service Provider is not required to:
 - 6.1.1** Alter the format in which it maintains or uses the data; or
 - 6.1.2** Make available the requested data on a more frequent basis than it produces the data and in no event shall it be required to provide the data more frequently than once an hour.
 - 6.2** In responding to all other data requests, each Transmission Operator or Transmission Service Provider shall make available the requested data within 45 days of receipt of the written request. Unless otherwise agreed upon, the Transmission Operator or Transmission Service Provider is not required to alter the format in which it maintains or uses the data.
 - 6.3** If making available any requested data under parts 6.1 or 6.2 of this requirement is contrary to the Transmission Operator’s or Transmission Service Provider’s confidentiality, regulatory, or security requirements, the Transmission Operator or Transmission Service Provider shall not be required to make available that data; provided that, within 45 days of the written

request, it responds to the requesting registered entity specifying the data that is not being provided, on what basis and whether there are any options for resolving any of the confidentiality, regulatory or security concerns.

M6. Examples of evidence for a data request that involves providing data at regular intervals on an ongoing basis (6.1), include, but are not limited to:

- Dated records of a registered entity's request, and examples of the response being met;
- Dated records of a registered entity's request, a statement from the requestor that the request was met (demonstration that the response was met is not required if the requestor confirms it is being provided); or
- A statement by the Transmission Operator or Transmission Service Provider that they have received no requests under this requirement.

Examples of evidence for all other data requests (6.2) include, but are not limited to:

- Dated records of a registered entity's request, and the response to the request;
- Dated records of a registered entity's request, a statement from the requestor that the request was met; or
- A statement by the Transmission Operator or Transmission Service Provider that they have received no requests under this requirement.

An example of evidence of a response by the Transmission Operator or Transmission Service Provider that providing the data would be contrary to the registered entity's confidentiality, regulatory, or security requirements (6.3) includes a response to the requestor specifying the data that is not being provided, on what basis and whether there are any options for resolving any of the confidentiality, regulatory, or security concerns.

Registered Entity Response to General Compliance with this Requirement (Required):

Describe, in narrative form, how you meet compliance with this Requirement. Provide a brief explanation, in your own words, of how you meet compliance with this Requirement. References to supplied evidence, including links to the appropriate page, are recommended.

Evidence Requested⁹:

Provide the following evidence, or other evidence to demonstrate compliance. If the provisioning of this evidence is burdensome or otherwise unreasonable, contact your CEA to arrange for sampling or other means of reduction of the quantity of evidence submitted.

See M6 for evidence to demonstrate compliance.

Registered Entity Evidence (Required):

The following information is recommended for all evidence submitted:

File Name, Document Title, Revision, Date, Page(s), Section(s), Section Title(s), Description

Also, evidence submitted should be highlighted and bookmarked, as appropriate, to identify the exact location where evidence of compliance may be found.

Audit Team Evidence Reviewed (This section to be completed by the Compliance Enforcement Authority):

Compliance Assessment Approach Specific to MOD-001-2, R6

This section to be completed by the Compliance Enforcement Authority

The RSAW Developer will complete this section with a set of detailed steps for the audit process. See the RSAW Developer’s Guide for more information.

Through either discussions with the entity under audit or other Transmission Service Providers, Transmission Operators, or any combination thereof, determine if a request was made in accordance with Requirement R6. If such a request was made, then determine that the entity under audit responded in accordance with parts 6.1 through 6.3 within 45 calendar days from receipt of the request.

Note to Auditor: In general, evidence obtained from independent third parties is stronger than assertions from the entity under audit. However, based upon the auditor’s perception of the risk of this requirement to the BES and the entity’s management practices (or internal controls) a simple assertion may provide sufficient evidence of compliance in many cases.

The aforementioned 45 day time period begins on the day when the written request was received by the entity. Dated emails would constitute one example of appropriate evidence of receipt and response under this requirement.

⁹ 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.

**DRAFT NERC Reliability Standard Audit Worksheet
TEMPLATE**

Auditor Notes:

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Revision History

| Version | Date | Reviewers | Revision Description |
|----------------|-------------|-------------------------------|-----------------------------|
| 1 | 10/31/2013 | NERC Compliance, Standards | New Document |
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