



MIDWEST
RELIABILITY
ORGANIZATION

Moving Forward – Hybrid Audits

Jess Syring, CIP Compliance Manager

Julie Sikes, O&P Compliance Manager

CMEP Conference, July 26, 2022

CLARITY

ASSURANCE

RESULTS

Topics Covered

- **NERC and FERC expectations**
- **Audit preparation**
- **Documentation review**
- **Onsite travel considerations**



NERC and FERC Expectations

- **FERC Order on Rules of Procedure (ROP) proposals**
 - RC/BA/TOP three-year audit requirement has not changed
 - Still requires an on-site visit during that time

A photograph of a man in a dark suit pointing his right index finger upwards. The word "GOVERNANCE" is superimposed in large, bold, dark blue capital letters over the image.

GOVERNANCE



Audit Preparation

- **Audit Team Lead (ATL) will reach out to understand any COVID restrictions in place for the community or the registered entity**
 - This would only affect onsite audit planning and not audit scope
- **This could occur prior to the Audit Notification Packet (ANP) going out**



Audit Preparation

- **Although not due to COVID, changes were made during the pandemic**
 - 120 day ANP notification
 - 3 work weeks of offsite documentation review
 - Holidays do not add additional days
 - 1 work week of onsite work and an exit presentation



Audit Preparation

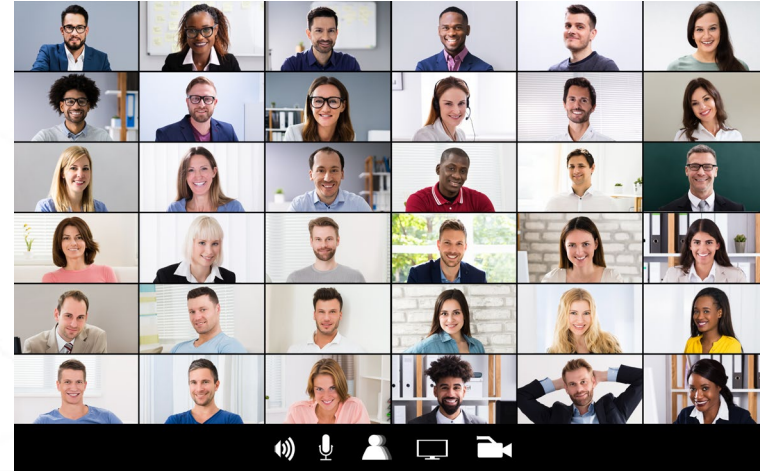
● Reporting

- No changes to reporting target dates
- Target date to deliver the non-public audit report is still within 30 calendar days
 - Longer timeframe if entity participates in Coordinated Oversight
- Registered entity has 10 business days to review and provide comments to MRO
- MRO will then publish the final report within 5 business days to registered entity Primary Compliance Contact (PCC) and NERC



Documentation Review

- **Requests for Information (RFIs) should be completed in same formats**
- **SME interviews will still be conducted**
 - Utilize WebEx or another remote meeting platform
 - Those in attendance will be included in the final audit report(s) by name and title



Onsite Travel Considerations

- **Audit scope**

- Are there requirements to have an onsite component of verification (CIP-014 or TOP-001)?
 - Reminder: FERC approved that CIP-014 evidence can now be shared remotely

- **Rules of Procedure requirement**

- There is still a three-year on-site requirement for BA, RC, and TOP functional registrations

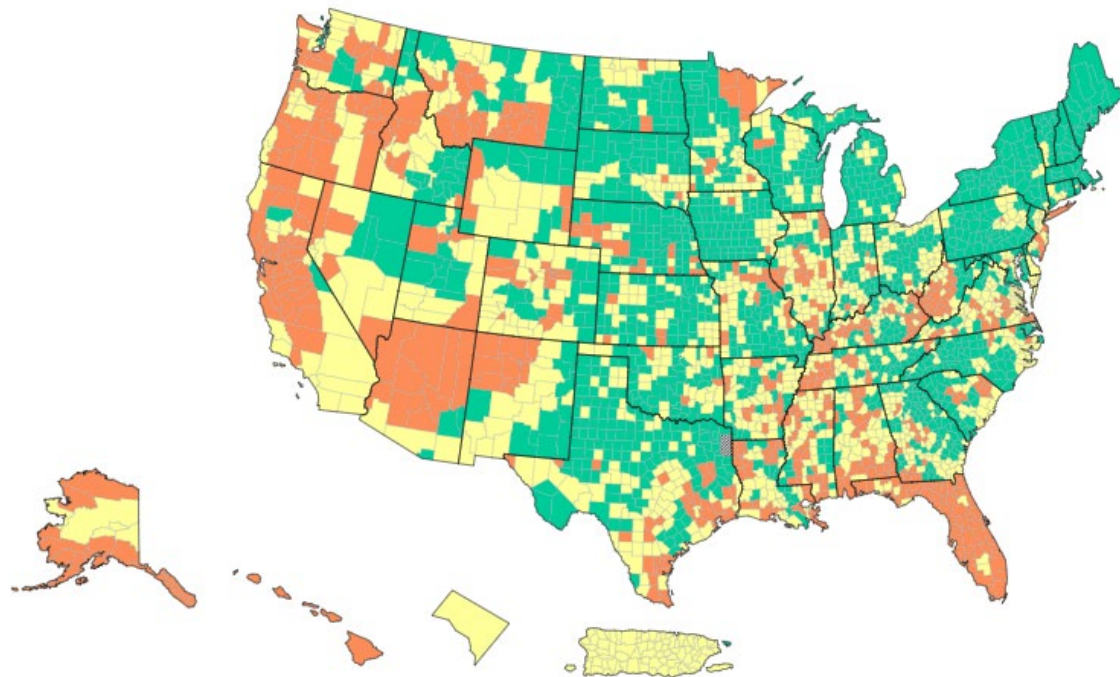


Onsite Travel Considerations

- There may not be as many auditors on-site
 - Reasons for who goes on-site
 - ATL or primary
 - SME for on-site visit
 - TOP-001
 - CIP-006
 - New auditor receiving training



COVID-19 Community Levels by Count



COVID-19 Community Levels in US by County

	Total	Percent	% Change
High	627	19.47%	7.3%
Medium	1142	35.45%	4.5%
Low	1452	45.08%	- 11.8%



covid.cdc.gov/covid-data-tracker – snapshot taken in July 2022

Pandemic Travel Considerations

- **What will MRO do if an auditor tests positive?**
 - MRO follows CDC recommended guidelines related to this scenario based on whether vaccinated or not
- **What will MRO do if an auditor is identified as a close contact before the onsite visit?**
 - MRO follows CDC recommended guidelines related to travel regulations of those who have tested positive or is a close contact of someone who tested positive





CLARITY

ASSURANCE

RESULTS