

Appropriate Compliance Contacts: ISO-NE/New England Participants

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2007 ISO New England Compliance Workshop

April 26, 2007

The State Room – Albany, New York

ISO-NE & New England Participants – Compliance Process Prior to ERO

- ISO-NE acted as the conduit for obtaining documentation from our Market Participants to assess Compliance with all NERC Standards and NPCC Criteria.
 - ISO-NE, as an “Area”, reported its Compliance with NPCC Criteria and NERC Standards directly to NPCC based on the compliance of New England Participants.
 - Using this information, NPCC assessed ISO-NE’s Compliance and reported to NERC our Compliance with all NPCC Criteria and NERC Standards.
- ISO-NE also obtained information from New England Participants to ascertain their compliance with ISO-NE Procedures.
- How does ISO-NE obtain information and from whom?

Customer and Asset Management System (CAMS)

- What is CAMS
- Implementation October 2004
- Objectives
 - Transparency
 - Control
- Phase I
 - Company Information
 - Personnel Information
 - Application Access
 - Committee Information
 - Contact Information
 - **Compliance Contacts – The focus today!**

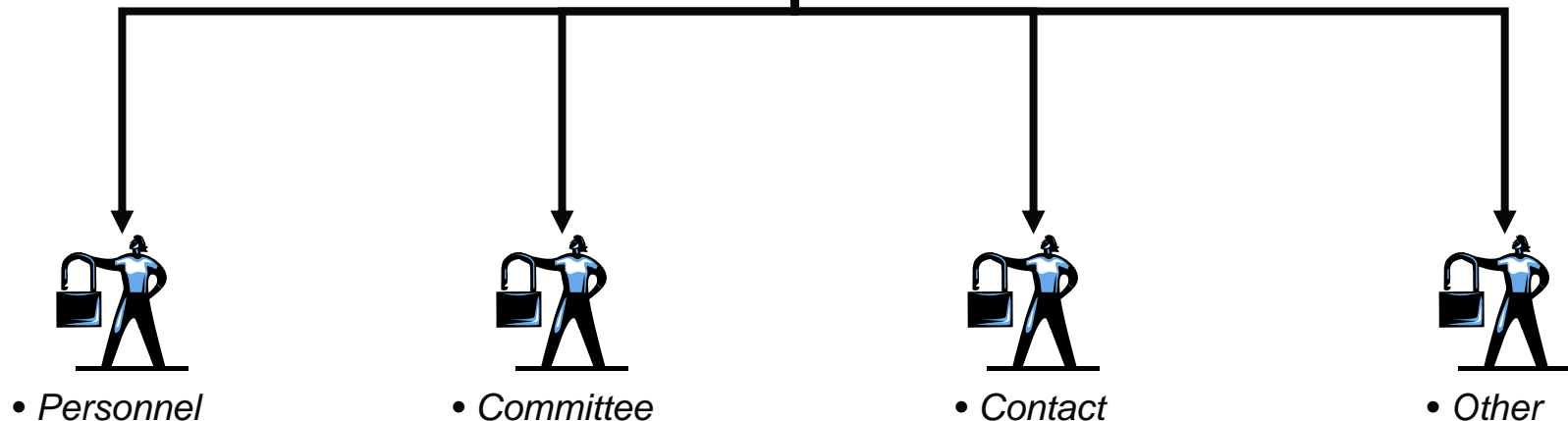
ISO-NE & New England Participants – Compliance Contacts Prior to ERO

- ISO-NE directed all Compliance inquiries to our Market Participants through their self-identified Compliance Contacts.
 - ISO-NE’s Customer and Asset Management System (CAMS)
 - Within CAMS a Compliance Contact record has been established.
 - The Compliance Contact record identifies the persons acting as:
 - “The Generation Compliance Contact Primary”
 - “The Generation Compliance Contact Secondary”
 - “The Transmission Compliance Contact Primary”
 - “The Transmission Compliance Contact Secondary”

How to Update Your Contact Information

Security Administrator (SA)

- *Can be more than one person*
- *Authorized by an Officer*
- *Controls all aspects of data*
- *Can Delegate limited data control*
- *Can authorize view only capability*



Updating Contact Information (Cont.)

Security Administrator (SA)



- Who is my SA?
 - Contact ISO New England Customer Service.
 - 413-540-4220

ISO-NE & New England Participants – Compliance Process, Post-ERO

- What processes stay the same?
 - ISO-NE continues to act as the conduit for obtaining documentation from our Market Participants to assess Compliance with NPCC, Inc. Criteria.
 - ISO-NE, as an Area, will report its Compliance with NPCC Criteria directly to NPCC based on the compliance of New England Participants.
 - ISO-NE will continue to obtain information from our Participants to ascertain compliance with ISO-NE Procedures.
 - For the above two Compliance processes, the Compliance Contacts will continue to be those persons identified in CAMS.

NPCC CBRE & New England Participants

– Compliance Process, Post-ERO

- What is **Different?**
 - NPCC CBRE, acting as the delegate of the ERO (NERC), will directly assess the compliance of Registered Entities with all applicable NERC Standards.
 - NERC Statement of Compliance Registry Criteria (Revision 3)
 - New England Participants/Non-Participants that are registered with NPCC CBRE (NERC Registration) will be contacted directly by NPCC CBRE.
 - Organizations will be directly responsible for registering and complying with approved Reliability Standards.
 - However, Participant compliance with certain NERC Standards will continue to require coordination with and reporting to ISO-NE.

ISO-NE & New England Participants – Appropriate Compliance Contacts

- New England Participants, that are registered with NPCC CBRE, may select individuals identified in their registration to become ISO-NE’s Compliance point-of-contacts.
 - The Security Administrator from each Participant can effect this change in CAMS.
 - Because not all New England Participants have registered with NPCC CBRE, ISO-NE cannot rely solely on the NPCC Registry for New England Contacts. ISO-NE must, for now, continue to use CAMS to identify Compliance Contacts.
- All ISO-NE Market Participants, registered with NERC, or not, must comply with “all applicable provisions of the ISO-NE Operating Documents and all applicable reliability guidelines, policies, standards, rules, regulations, orders, license requirements, and other requirements...” (Section 3.4 of the Market Participant Service Agreement (MPSA) (Attachment A to the Tariff).

In Conclusion

- Effectively communicate with the authorized individual at your company to ensure your Compliance Contact data is accurately maintained in ISO-NE's CAMS database.
- Register with NPCC CBRE in accordance with the NERC Statement of Compliance Registry Criteria (Revision 3).

Who do I Contact with Questions?

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