

Alberta Reliability Standards Reliability Standards Audit Worksheet Guide

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Introduction

1.0 BACKGROUND

The AESO is mandated to carry out compliance monitoring for Alberta Reliability Standards under Section 23 of the Transmission Regulation. In alignment with ISO rule 103.12, the Alberta Reliability Standards Compliance Monitoring Program (CMP) was established and defines more specific methods for monitoring compliance with reliability standards.

The AESO is developing Reliability Standard Audit Worksheets (RSAWs) as a documentation and assessment tool for use in the Compliance Monitoring Program.

1.1 PURPOSE OF THIS GUIDE

The purpose of this guide is to inform market participants of the procedures and guidelines related to the use of RSAWs.

1.2 APPLICABILITY

This guide is of interest to all registered market participants or parties that are subject to monitoring under the Compliance Monitoring Program. Refer to the *Alberta Reliability Standards Registration Guide* for information on registration.

For the purpose of this guide, the term "compliance monitor" is applied as follows:

For the ISO, the compliance monitor is the Market Surveillance Administrator (MSA). For all other registered market participants, the compliance monitor is the AESO.

2 About this Guide

2.0 SECTIONS

This guide is divided into 5 sections:

Section 1: Introduction

Provides the background, purpose and applicability of this document.

Section 2: About this Guide (this section)

Provides information on how to use this document.

Section 3: Procedures

Provides information on what the market participant needs to do to use the Reliability Standards Audit Worksheets (RSAWs). Subsections cover:

- 3.0 Assessment overview
- 3.1 RSAW overview
- 3.2 Market participant's use of RSAWs

Section 4: Guidelines

Provides information on the guidelines used to create the RSAW guide.

Section 5: Related Documents and Revision History

Provides links to documents referenced in this document and the revision history

2.1 NAVIGATING THE ELECTRONIC VERSION

The electronic version of this guide contains useful navigation tools that can be used to find pertinent information without searching through each section.

Table of contents

The table of content shown prior to section 1 can be used as a means of navigating to any section or subsection in the guide.

To jump to a section or sub-section simply click on any line item in the table of contents.

Underlined text

Text that is <u>underlined</u> in <u>blue</u> is used to indicate a link to related topics within the guide or to documents on the internet

To use the link, click on the underlined text.

3 Procedures

The purpose of this section is to give registered market participants information on the procedures related to the use of RSAWs. Guidelines related to the procedures are given in section 4.

3.0 ASSESSMENT OVERVIEW

An assessment is a review of submitted evidence to verify that requirements of each standard have been complied with. Assessments are guided by the requirements and measures in the standard and by the approaches defined in the RSAW.

Procedure:

1. Understand the basis of an assessment

- **a.** An assessment includes assessing each requirement/measure in the standard, unless the requirement is not applicable to the entity.
- **b.** Assessments are based on an approach stated in each RSAW.
- **c.** In an assessment, the submitted evidence is reviewed, references to the evidence are recorded/noted, and an opinion on compliance is made based on sufficient appropriate evidence.
- **d.** A fully completed RSAW includes references, findings, explanations, notes, and assessment of compliance based on the evidence provided.

3.1 COMPLIANCE MONITOR'S USE OF RSAWS

An RSAW is a document or worksheet used by the compliance monitor to assess compliance to a reliability standard.

Procedure:

1. Understand the compliance monitor's use of RSAWs

- **a.** An RSAW is an internal process document for the compliance monitor, to assist the compliance monitor in carrying out its duties.
- **b.** An RSAW does not set new requirements for compliance.
- **c.** An RSAW is developed once the standard is approved. The compliance monitor will make them available publicly for information. .
- **d.** An RSAW is typically used in the audit process, but may be used for assessing compliance in any process stated in the Compliance Monitoring Program.
- **e.** An RSAW is a worksheet for completing an assessment and does not in any way restrict the scope of an audit or an assessment.
- **f.** A completed RSAW assessment may be submitted in a referral where a contravention of a standard or requirement is suspected.



3.2 MARKET PARTICIPANT'S USE OF RSAWS

RSAWs are primarily used by registered market participants during a compliance monitoring audit to point the compliance monitor to submitted evidence files. The RSAW also helps market participants understand what steps the auditor will use during the audit assessment process.

Procedures:

1. When preparing for evidence submission, obtain the most current RSAW

Prior to a compliance monitoring audit, the market participant will receive an audit scope listing applicable standards for the audit period. The market participant should download the latest version of each applicable RSAW from the AESO website. Current RSAWs can be found on the AESO website under: Rules, Standards and Tariff > Compliance > Alberta Reliability Standards Compliance > Reliability Standards Audit worksheets. To access the RSAWs, click here then browse through to the Reliability standards audit worksheets section. Individual RSAWs are placed within the standard categories shown on the RSAWs section.

2. For evidence submission, fill out the applicable RSAW(s)

Once the market participant has obtained the current version of an RSAW, the market participant needs to fill out the RSAW and send it to the compliance monitor along with the evidence files. The RSAW is filled out as follows:

- a. Next to each applicable requirement, provide a hyperlink to the evidence file in the "Evidence" column of the RSAW. Although linking to a file is preferred, the file may also be embedded directly in the RSAW.
- **b.** If required, provide a description of the evidence location within the file (i.e. page number, section number... etc.) next to the evidence link in the "description column". The description column should not be used to provide additional evidence.



4 Guidelines

The purpose of this section is to provide registered **market participants** with information on the guidelines related to registration. Procedures related to the guidelines are given in section 3.

4.0 ASSESSMENT OVERVIEW

Monitoring of reliability standards is carried out using the specific methods described in the Compliance Monitoring Program. Assessments of compliance to the standard and requirements are conducted as part of the program, typically in an audit or an investigation.

An assessment is a review of submitted evidence to verify that requirements of each standard have been complied with. Assessments are guided by the requirements and measures in the standard and by the approaches defined in the RSAW. A written report of findings results from an assessment.

Assessments are based on the following:

- 1. Requirements are defined and approved within each standard. A requirement is a 'technical' or 'operational' action, activity, or deliverable that a responsible entity is required to perform or provide as stated in the standard. An assessment includes assessing each requirement/measure in the standard, unless the requirement is not applicable to the entity.
- 2. Measures stated in each standard provide an indicator of what information or evidence will be reviewed in an assessment. An example, a measure of a requirement may be existence of a document, timeliness of an action, completeness of a required submission, quality of contents, accuracy or adherence to referenced standards, etc. Measures are determined and approved within each standard, and are intended to be a guide in conducting the assessment.
- 3. Assessments are based on an approach stated in each RSAW. The approach includes the method, steps, checks, questions, etc. that may be used in an assessment. Approaches provide guidance on how an assessment is conducted and are unique to each standard or requirement. The approach supports a consistency and efficiency in conducting assessments for that standard.
- 4. Evidence is documentation, data, or information that demonstrates or shows that a responsible entity is in compliance with the actions or activities specified in the 'requirement'. Examples of evidence are voice recordings, electronic logs, reports, written correspondence or emails, certifications or agreements, etc. In some cases, the deliverable of the requirement is the evidence itself, as in the case of a requirement specifying that a report must be prepared. In an assessment, the submitted evidence is reviewed, references to the evidence are recorded/noted, and an opinion on compliance is made based on sufficient appropriate evidence.
- 5. An assessment report is a fully completed RSAW and includes references, findings, explanations, notes, and assessment of compliance based on the evidence provided. The assessment report is prepared by the compliance monitor and may be provided to the enforcement authority in the event of a suspected contravention.



4.1 COMPLIANCE MONITOR'S USE OF RSAWS

An RSAW is a document or worksheet used by the compliance monitor to assess compliance to a reliability standard. The tool is intended to support consistent and efficient assessments of each standard. It re-states the requirements and associated measures of that standard; provides a description of the approach; and a template for documenting finding, evidence and notes.

Some important characteristics of RSAWs are:

- 1. An RSAW is an internal process document for the compliance monitor, to assist the compliance monitor in carrying out its duties. An RSAW is not an authoritative document, and does not require external consultation or review.
- An RSAW does not set new requirements for compliance. Entities are not required to comply with RSAWs, but are required to comply with the approved standard and the requirements of the standard.
- 3. An RSAW is developed once the standard is approved. The compliance monitor will make RSAWs available. The target is to have new RSAWs completed within 60 days of a standard being approved and becoming effective.
- An RSAW may be updated from time to time by the compliance monitor. The compliance monitor will provide notification of changes through stakeholder updates, and publish updated RSAWs publicly.
- 5. An RSAW will be publicly available to market participants for audit evidence submission purposes and to assist them in understanding the scope of audit procedures and support their internal compliance processes.
- 6. An RSAW is typically used in the audit process, but may be used for assessing compliance in any process stated in the Compliance Monitoring Program.
- 7. An RSAW is a worksheet for completing an assessment and does not in any way restrict the scope of an audit or an assessment.
- 8. A completed RSAW assessment will be submitted as evidence in a referral where a contravention of a standard or requirement is suspected.

4.2 MARKET PARTICIPANT'S USE OF RSAWS

The market participant's use of RSAW's is primarily during a compliance monitoring audit.

- Prior to a compliance monitoring audit, the compliance monitor will send, as an attachment to the audit notification letter, an audit scope listing applicable standards for the audit period.
- **2.** Based on the audit scope, the market participant is required to fill out each applicable RSAW. For each applicable requirement within the applicable RSAW, the market participant should provide the following information:
 - **a.** A link to the evidence file. Although a linked file is preferred, evidence files may also be embedded.
 - **b.** If the file contains multiple sections or pages, a description of where the evidence within the file can be found.
- 3. The completed RSAWs must be sent to the compliance monitor at the same time as the evidence submission.

5 Related Documents and Revision History

5.0 RELATED DOCUMENTS

Documents referenced in this guide can be found by clicking on the following website page links:

Alberta Reliability Standards Compliance Monitoring Program

Alberta Reliability Standards Registration Guide (Section header: Registration)

Consolidated Authoritative Document Glossary

ARS Market Participant Audit Guide (Section header: Registration)

5.1 REVISION HISTORY

This document is a compliance monitor information document and guide, and not a compliance monitor authoritative document. Revisions to this document may be made from time to time by the AESO Compliance group. Registered market participants will be notified of revisions through the AESO Stakeholder Newsletter.

Revision	Date	Comments
1.0	January 25, 2010	Initial Version
2.0	December 18, 2012	Re-reformatting and wording changes to reflect updates to the ARS Market Participant Audit Guide.
2.1	November 12, 2013	Updated ISO Rule 12 references.