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	<p>Project Operations</p> <p>HYDROPOWER OPERATIONS AND MAINTENANCE POLICY IMPLEMENTATION OF BULK POWER SYSTEM RELIABILITY COMPLIANCE PROGRAM</p>	
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CECW-CO

Pamphlet
No. 1130-2-551

30 September 2009

Project Operations
HYDROPOWER OPERATIONS AND MAINTENANCE POLICY
IMPLEMENTATION OF BULK POWER SYSTEM RELIABILITY COMPLIANCE
PROGRAM

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Project Operations
HYDROPOWER OPERATIONS AND MAINTENANCE POLICY
IMPLEMENTATION OF BULK POWER SYSTEM RELIABILITY COMPLIANCE
PROGRAM

1. Purpose.

a. This Engineer Pamphlet (EP) provides policy and guidance to establish and maintain a USACE corporate program for compliance with the applicable Federal Energy Regulatory Commission (FERC) approved Bulk Power System (BPS) Reliability Compliance Standards. For the purpose of this document, the term “compliance” is understood to mean “voluntary compliance” with applicable Federal Energy Regulatory Commission approved Bulk Power System Reliability Standards. Compliance shall be executed to the maximum extent possible within the constraints of authorized and appropriated resources. This program shall be referred to herein and after as the Army Corps of Engineers Compliance Monitoring and Enforcement (ACE-CME) Program.

b. Brief History - The US Energy Policy Act of 2005, Title XII – Electricity, requires all users, owners and operators of the BPS to register with the North American Electric Reliability Corporation (NERC). Congress enacted this legislation after the northeast power grid Blackout of 2003. During this event, approximately 50 million users lost power. The 2005 legislation gave FERC the authority to regulate and levy fines in order to ensure compliance with FERC approved Reliability Standards.

c. NERC Entity Registration - In accordance with the Energy Policy Act of 2005, NERC has defined and categorized all users, owners and operators of the BPS into specific type(s). See Reference 4.c for a complete list and definition of each Entity Registration type. NERC has registered applicable USACE Districts as one or more of the following:

- (1) Generator Owners (GO)
- (2) Generator Operators (GOP)
- (3) Transmission Owners (TO)
- (4) Transmission Operators (TOP)

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d. This EP defines the general requirements and the organization structure of the ACE-CME Program.

2. Applicability.

a. This EP applies to all USACE elements and all USACE commands having responsibility for compliance. Specifically, this EP applies to the full spectrum of Hydropower Operations and Maintenance business processes and standard operating procedures required for USACE to achieve and remain in compliance with FERC approved Reliability Standards.

b. This EP details the ACE-CME Program that will be used to ensure compliance within USACE. It defines the process to develop a Compliance Monitoring and Enforcement Program, establishing accountability and expectations for compliance, delegations of authority, and the creation of compliance monitoring and enforcement committees, units and teams.

3. Distribution.

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4. References.

a. ER 1130-2-551 – Project Operations, Hydropower Operations and Maintenance Policy, Bulk Power System Reliability Compliance Program

b. FERC Regulatory Approved Reliability Standards:
(http://www.nerc.com/~filez/standards/Reliability_Standards_Regulatory_Approved.html)

c. NERC list of registered entities:
(<http://www.nerc.com/>)

d. NERC glossary of BPS terms:
(ftp://www.nerc.com/pub/sys/all_updl/standards/rs/Glossary_02May07.pdf)

e. Energy Policy Act of 2005, Pub. L. 109-58, 119 Stat. 941 (2005). 16 U.S.C. § 824, et seq.

5. Policy.

a. In accordance with Army policy, the USACE does not consider itself a user, owner, or operator of the Bulk Power System as defined in the Energy Policy Act of 2005. Moreover, as the provisions in that Act regarding electric reliability do not include an explicit waiver of sovereign immunity, it is Army policy that USACE cannot be subject to monetary fines or penalties issued pursuant to that Act by NERC or FERC. Nonetheless, it is Army policy that

USACE will support the goals of the Electric Reliability Organization and strive to meet the Reliability Standards voluntarily subject to the availability of funds and the requirements of project operations.

b. It is the policy of USACE that the procedures and associated doctrine contained in the referenced Engineer Regulation (ER) and this EP will, to the extent legally and financially practical, guide appropriate hydropower operation and maintenance management initiatives and business processes in USACE's corporate approach to compliance. To this end, all affected USACE Commands will seek to achieve total integration of the referenced ER, this EP and associated doctrine into their hydropower operations and maintenances processes.

c. All USACE elements, Division Commands, and District Commands shall, to the extent legally and financially practicable, integrate the ACE-CME Program principles and associated doctrine into hydropower program management business practices across the full spectrum of USACE activities.

d. Each USACE District Command element shall establish policies, practices, and standard operating procedures consistent with the requirements of ER-1130-2-551 and this EP.

6. Bulk Power System Industry Responsibilities.

a. FERC has approval authority over electric Reliability Standards proposed by NERC. FERC also approves, disapproves, and/or modifies the fines and/or sanctions levied by NERC. In accordance with Army policy, USACE will not pay monetary fines or penalties levied against USACE under the reliability provisions of the Energy Policy Act of 2005. FERC is an independent agency that regulates interstate transmission of electricity, ensures the reliability of the high voltage interstate transmission system, and uses civil penalties and other means against energy organizations and individuals who violate FERC rules in the energy markets.

b. NERC has been appointed by FERC as the Electric Reliability Organization (ERO) as defined in the Energy Policy Act of 2005. As the appointed ERO, NERC's mission is to improve the reliability and security of the BPS in North America. The ERO's role is to develop national BPS Reliability Standards, determine if regional Reliability Standards are necessary, monitor compliance and recommend fines and sanctions for violations of the BPS Reliability Standards, assess future adequacy, audit owners, operators, and users for preparedness and educate and train industry personnel. NERC is a self-regulatory organization that relies on the diverse and collective expertise of industry participants. As the Electric Reliability Organization, NERC is subject to audit by both the FERC and governmental authorities in Canada.

c. Regional Entities (RE), monitor and enforce compliance of registered entities in their respective regions through data requests, filing entity reports, performing entity audits and

performing entity spot checks. When appropriate, the REs develop regional-specific, FERC-approved Reliability Standards.

d. Power Marketing Agencies (PMA), in accordance with the NERC definition, are defined as one of or a combination of the following registered entities: Balancing Authorities, Load Serving Entities, Purchasing Selling Entities, Resource Planners, Transmission Operators, Transmission Owners, Transmission Service, and Transmission Service Provider, and others. The roles and responsibilities of the PMA, in support of USACE compliance effort, will depend on the requirements of the specific Reliability Standard.

e. Other Registered Entities (Generation and Transmission Dispatchers, Balancing Authorities, Load Serving Entities, etc.) with roles and responsibilities as defined in the NERC glossary of terms. See Reference 4.d for a complete list of NERC BPS terms.

7. USACE Responsibilities.

a. USACE owns and operates facilities that have been identified by NERC as part of the Bulk Power System.

b. Establish a formal organized program (i.e., ACE-CME) that identifies the personnel, teams, units, and/or committees necessary to develop and provide compliance policies, procedures, training, monitoring and enforcement. This program shall be developed, implemented and maintained to ensure compliance. In addition to being a planned and organized effort to guide USACE compliance activities, this program shall provide and clearly communicate USACE commitment to compliance.

c. The ACE-CME Program shall be reviewed and updated as required for USACE to maintain compliance.

d. HQUSACE will:

(1) Establish policies and procedures to implement and support the ACE-CME Program as required by ER 1130-2-551.

(2) Establish and maintain an organization to support the ACE-CME Program. The ACE-CME Program shall be organized to have representation at all applicable command levels and elements within USACE. In general, the Program shall include the following applicable executive and execution level personnel, teams, units, and committees:

(a) ACE-CME Program Executive Level Team:

(1) HQUSACE Directorate of Civil Works (CECW)

(2) HQUSACE Chief of Operations Division (CECW-CO)

(3) HQUSACE Office of the Chief Counsel (CECC)

(4) HQUSACE Office of Homeland Security

(b) ACE-CME Execution Level Team:

(1) ACE-CME Program Oversight Committee

(2) Reliability Standards Monitor

(3) Regional Compliance Monitoring and Enforcement Units (RCMEU)

(4) District Implemented Reliability Compliance Team (DIRECT)

(5) See Figure 1 in Appendix B for a typical ACE-CME Program organization chart.

(6) The Program Executive level team has overall responsibility to ensure ACE-CME Program implementation and execution.

(7) The Execution level team has functional responsibility to ensure ACE-CME Program implementation and execution.

(8) Establish and maintain liaison with appropriate Federal agencies to coordinate the ACE-CME Program.

(9) Support the ACE-CME Program with applicable resources.

e. Major Subordinate Commands (USACE Divisions) will:

(1) Support the ACE-CME Program with necessary resources (funding, personnel, etc.)

(2) Assist in developing and approving guidance, procedures, publications, supplements, or other appropriate compliance documents to maintain consistency within the MSC.

(3) Establish and maintain liaison with appropriate Federal agencies to support the ACE-CME Program.

(4) Provide support for Regional Compliance Monitoring and Enforcement Units.

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(5) Support regional compliance efforts to ensure inter-regional consistency with applicable Reliability Standards, Federal laws and regulations.

(6) Review and prioritize District out of cycle programming and funding requests to support compliance.

f. Subordinate Commands (USACE Districts Registered with NERC) will:

(1) Support the District Commander in his duties as the Reliability Compliance Program Administrator (RCPA) and Executive Signatory for District compliance. As the RCPA, the Commander has the primary authority and overall responsibility for executing the ACE-CME Program for their District. The general roles and responsibilities of the RCPA are defined within another section of this EP.

(2) Identify an individual to serve as the Reliability Compliance Program Manager (RCPM). The official appointment along with the general roles, responsibilities, and authorities of the RCPM are defined within another section of this EP. At the discretion of the Division/District, the identified individual maybe an existing staff member or new hire.

(3) Support the appointed Bulk Power System Cyber Security Senior Manager (BPS-CSSM). The official appointment along with the general roles and responsibilities of the BPS-CSSM are defined within another section of this EP.

(4) Identify an individual to serve as the Information Assurance Security Officer (IASO). The official appointment along with the general roles and responsibilities of the IASO are defined within another section of this EP and AR 25-2.

(5) Provide resources and personnel to support a District Implemented Reliability Compliance Team (DIRECT). The general roles and responsibilities of the DIRECT are defined within another section of this EP.

(6) Strive to achieve and remain in compliance with FERC approved Reliability Standards.

(7) Monitor and document the status of the District's overall compliance.

(8) Communicate the status of the District's overall compliance to the respective Regional Entity.

(9) Ensure that plans and procedures are established and executed to address District compliance.

(10) Establish and maintain liaison with appropriate officials from, Federal, state, local and other agencies as required for compliance.

(11) Prepare and submit budget request for compliance and ACE-CME Program activities to MSC and HQUSACE.

(12) Ensure that compliance support to HQUSACE and MSC is provided as required.

8. USACE ACE-CME Program Oversight Committee.

a. A USACE ACE-CME Program Oversight Committee shall be established.

b. The Program Oversight Committee shall consist of and have representation from the following HQUSACE and major command elements:

(1) HQUSACE Hydropower Business Line Manager

(2) HQUSACE Office of Counsel

(3) HQUSACE Office of Homeland Security

(4) Corporate Information

(5) LRD Hydropower Representative

(6) MVD Hydropower Representative

(7) NWD Hydropower Representative

(8) SAD Hydropower Representative

(9) SWD Hydropower Representative

(10) Chair of Southeastern RCMEU

(11) Chair of Southwestern RCMEU

(12) Chair of Western RCMEU

(13) Reliability Standards Monitor

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c. The HQUSACE Hydropower Business Line Manager shall serve as the Chair of the Program Oversight Committee.

d. See Figure 2 in Appendix B for a typical USACE ACE-CME Program Oversight Committee organization chart.

e. The Program Oversight Committee shall have authority and independence to access the applicable areas of USACE Hydropower Operations and Maintenance Programs to monitor overall command level (i.e., MSC and District) compliance.

f. The primary roles and responsibilities of the Program Oversight Committee shall generally include but are not limited to the following:

- (1) Oversee the development and implementation of the ACE-CME Program.
- (2) Review and recommend policies and criteria for supporting compliance.
- (3) Review the level, methods, funding and execution of compliance.
- (4) Review the ongoing assessment, evaluation, and overall level of USACE compliance.
- (5) Report its findings and recommendations to the USACE compliance community.
- (6) Assist in educating the HQUSACE command elements concerning compliance program execution, budgeting, and resource issues.
- (7) Facilitate communication between the RCMEU's to share best practices and lessons learned and to identify significant issues and trends impacting the ACE-CME Program.
- (8) Review the RCMEU annual compliance status reports. Submit annual summary of compliance reports to HQUSACE Chief of Operations on or before 15 January of each year.
- (9) Review the annual compliance budget, projections and expenditure forecasts.
- (10) Monitor compliance processes and procedures for consistency across regions.
- (11) Develop and implement consistent document filing and data retention procedures.
- (12) Schedule and conduct interregional compliance audits and spot checks.
- (13) Monitor and provide compliance updates on changes and revisions to applicable Reliability Standards and regulations to the compliance community of practice.

(14) Monitor changes in USACE business operations, policies, procedures, products, and/or services that affect compliance.

9. Reliability Standards Monitor. The HQUSACE Hydropower BLM shall appoint a Reliability Standards Monitor to continually monitor the compliance industry for new FERC approved and pending Reliability Standards that may impact the ACE-CME Program. See Appendix C for samples of a typical appointment memorandum. The primary purpose of the Reliability Standards Monitor shall be to serve as the subject matter expert on FERC approved standards and provide general guidance to the HQUSACE Hydropower BLM, Compliance Oversight Committee, and RCMEU.

10. Regional Compliance Monitoring and Enforcement Unit (RCMEU).

a. ACE-CME Program Regional Compliance Monitoring and Enforcement Units shall be established.

b. RCMEUs shall be regional teams with sufficient authority and independence to access the applicable areas of USACE Hydropower Operations and Maintenance Programs to ensure intra-regional compliance.

c. RCMEUs shall be implemented and organized in accordance with the area (e.g., regional, geographical, etc.) of the associated Federal Power Marketing Agency (PMA). As a minimum, RCMEUs shall be developed and aligned with the following PMAs:

- (1) Southeastern Power Administration (SEPA) – Southeastern RCMEU
- (2) Southwestern Power Administration (SWPA) – Southwestern RCMEU
- (3) Western Area Power Administration (WAPA) – Western RCMEU
- (4) Bonneville Power Administration (BPA) – Western RCMEU

d. Each RCMEU shall consist of and have representation from the following USACE major commands and elements:

- (1) All RCPMs within the region.
- (2) MSC Representation from within the region.
- (3) Hydropower Project Representative – One Field Representative per DIRECT.

(4) PMA Representation (Note: Each PMA will be extended an open invitation to participate in the respective USACE RCMEU).

e. See Figure 3, Figure 4, and Figure 5 in Appendix B for typical RCMEU organization charts arranged in accordance with the identified PMAs.

f. The members of each RCMEU shall elect, from within the unit, a USACE team member to Chair the RCMEU. This person shall serve as the regional representative on the Compliance Oversight Committee. Each Chair shall serve a staggered 2-two to 3-three year term as scheduled by the Compliance Oversight Committee.

g. Each RCMEU shall:

(1) Develop typical compliance policies and procedures, which will guide the Divisions and Districts in their execution of the ACE-CME Program. In general this will include:

- (a) Standard Operating Procedures
- (b) Internal and external communication plan
- (c) Mitigation plans
- (d) Self reporting
- (e) Compliance documentation and control
- (f) Compliance data storage
- (g) Compliance training
- (h) Internal Compliance Monitoring and Audit Plan
- (i) Internal arbitration and dispute resolution
- (j) Determining current level of regional percent compliance
- (k) Assisting in response to alleged violations

(2) Complete an Annual Regional Compliance Status Report and submit it to the USACE Compliance Oversight Committee on or before the first day of November of each year. The time frame for this report shall be based on the previous Fiscal Year (FY).

(3) Monitor compliance processes and procedures for consistency across all major command elements within its region.

(4) Schedule and conduct District compliance audits and compliance spot checks.

(5) Assist in revising, developing, reviewing, and/or implement Memoranda of Understanding (MOUs), Memoranda of Agreements (MOAs), or other applicable documents with the respective PMA and other Registered Entities to support compliance.

(6) Support USACE Compliance Oversight Committee.

(7) Develop, review, and implement Standard Operating Procedures to support compliance across all major command elements within its region.

(8) Review and monitor BPS Reliability Standards, requirements and measures for applicability.

(9) If requested, assist the RCPMs in performing district level and RE audits.

(10) Develop a unified regional compliance status reporting format to be utilized and adopted by all Districts within its region.

(11) Assist RCPMs and Districts in developing, recommending and reviewing compliance policies and procedures.

(12) Participate in appropriate NERC and Regional Entity (RE) activities

(13) Continuously monitor and track the current level of percent compliance of all major command elements within its region.

(14) RCMEU will support peer review teams as necessary to ensure compliance.

11. Reliability Compliance Program Administrator (RCPA).

a. The District Commander at each of the NERC registered Districts shall serve as the RCPA for the associated district. The RCPA shall be ultimately responsible for implementing the ACE-CME Program within their District. The RCPA shall serve as the Executive Signatory for District's compliance. The RCPA shall:

(1) Sign compliance program documents that require Executive Signature

(2) Provide applicable policy statements regarding compliance

- (3) Appoint a Reliability Compliance Program Manager (RCPM)
- (4) Appoint a Bulk Power System Cyber Security Senior Manager (BPS-CSSM)
- (5) Allocate necessary resources, to the extent resources are available, to ensure compliance

b. Authority of RCPA. The RCPA is the Executive Signatory for their District. The RCPA will have final approval and authority regarding all RE Compliance issues including but not limited to the following:

- (1) Self certification letters and documents
- (2) Self reporting of violations
- (3) Mitigation plans
- (4) MOUs, MOAs and Delegation agreements with PMA, BA, RC, etc
- (5) Responding to applicable NERC/RE surveys and requests for documentation
- (6) NERC Compliance Audits

12. Reliability Compliance Program Manager (RCPM).

a. Each NERC registered District within USACE shall be represented by a RCPM. The RCPM shall be responsible for coordinating the overall compliance of their respective District(s).

b. The RCPM shall be appointed by the RCPA. See Appendix C for samples of a typical appointment memorandum. The RCPM shall have sufficient authority and independence to access all areas of the District's Hydropower Operations and Maintenance Programs to ensure compliance. The RCPM shall:

- (1) Serve as a member of the RCMEU
- (2) Manage the District's compliance program
- (3) Report and coordinate compliance activities to the RCPA, District, and RCMEU
- (4) Ensure the development and monitoring of mitigation and/or corrective actions plans

(5) Assist in developing cost estimates for compliance related activities and provide budget information and data to the District Hydropower BLMs and others

c. Authority of RCPM. Each RCPM shall serve as the Districts' authorized representative on compliance related issues. These issues will generally include, but are not limited to, the following:

- (1) Communication with RCPA, RE, PMAs, project, RCMEU, etc.
- (2) Develop mitigation plans
- (3) File mitigation plans with RE
- (4) Monitor progress on mitigation plans
- (5) Report mitigation plan status to RE
- (6) Monitor district compliance
- (7) Perform internal districts audits
- (8) Point of contact for RE audits
- (9) Point of contact with other Registered Entities
- (10) Lead the development of district compliance policies and procedures
- (11) Develop delegation agreements with PMA, BA, RC, etc.

d. RCPM and District Implemented Reliability Compliance Team Responsibilities. The RCPM will establish and lead a District Implemented Reliability Compliance Team (DIRECT). Each NERC registered District shall be represented by a DIRECT. Where applicable, one or more Districts may be represented by the same DIRECT. Each DIRECT shall have members with the general roles and responsibilities identified in Appendix B, Figure 6. The RCPM with the Team's input and support shall:

- (1) Develop, review and implement standard operating procedures to support compliance and training needs for management and hydropower staff.
- (2) Provide input to the RCMEU and district in developing, recommending and reviewing compliance policies and procedures.

- (3) Develop memoranda of agreement/understanding and coordinate responses to REs, PMAs, Utilities, etc.
- (4) Identify the Responsible Individual (RI) required to provide the data and/or documentation necessary to show compliance with each applicable Reliability Standard.
- (5) Continuously monitor and track the district's current level of percent compliance.
- (6) Store compliance data and documentation in accordance with USACE Compliance Data storage requirements.
- (7) Coordinate and support other hydropower project reviews (e.g., Power Review of Operations and Maintenance reports, etc.) as necessary to ensure compliance.
- (8) Conduct periodic district level compliance audits.
- (9) Develop compliance reports. This shall include, but not be limited to, routine compliance reporting, responding to requests from other entities, and analyzing and developing reports for mis-operations, disturbances and equipment failures.
- (10) Monitor the state of the District's compliance program too ensure that USACE established internal compliance policies and procedures are being followed.
- (11) Participate in appropriate RE activities (Compliance Workshops, Reliability Standard development and review, etc.).
- (12) Shall facilitate the District's compliance in accordance with the overall goals and guidelines of the USACE ACE-CME Program and RCMEU prepared compliance policies and procedures.

13. Bulk Power System Cyber Security Senior Manager (BPS-CSSM).

a. Each NERC registered District within USACE shall have an appointed Bulk Power System Cyber Security Senior Manager (BPS-CSSM). The RCPA shall appoint the Chief, Operation Division at each of the NERC registered Districts as the BPS-CSSM for the associated District. See Appendix C for samples of a typical appointment memorandum. The BPS-CSSM shall be responsible for oversight of their respective District's overall compliance with the Critical Infrastructure Protection (CIP) Reliability Standards.

b. Authority of BPS-CSSM. Each BPS-CSSM shall serve as the Districts' Senior Manager and authorized representative for issues related to compliance with the CIP Reliability Standards. These issues will generally include, but are not limited to, the following:

- (1) Provide general oversight of compliance with CIP Reliability Standards
- (2) Review District's Critical Asset Identification Method
- (3) Approve District's list of Critical Assets and Critical Cyber Assets.
- (4) Approve exceptions to the USACE national Cyber Security Policy
- (5) Approve exceptions to the District's Cyber Security Policy
- (6) Review Mitigation Plans for CIP Standards

14. Information Assurance Security Officer (IASO).

a. In accordance with the requirements of AR 25-2 "Information Assurance" each NERC registered District within USACE shall be represented by an appointed Information Assurance Security Officer (IASO). AR 25-2 requires the Commander or Manager/Director of the activity (i.e., USACE District) responsible for the identified Information System (IS) to appoint an IASO for each IS or group of ISs. For the purpose of this Engineer Pamphlet, the term "Information System" means the SCADA and/or control systems used in the operation of the District's hydropower facilities. See Appendix C for samples of a typical appointment memorandum. In addition to the responsibilities identified in AR 25-2, the IASO shall also be responsible for coordinating the compliance of the respective District's SCADA and/or control system with the CIP Reliability Standards. Each IASO shall serve as the Districts' representative for issues related to compliance with the CIP Reliability Standards. These issues will generally include, but are not limited to, the following:

- (1) Serve as a member of the DIRECT
- (2) Monitor and Ensure District's compliance with CIP Standards
- (3) Report and coordinate compliance activities to the BPS-CSSM and RCPM
- (4) Assist RCPM in developing and monitoring mitigation plans for CIP Standards
- (5) Assist in developing cost estimates for CIP compliance related activities
- (6) Perform internal district(s) CIP audits
- (7) Assist other districts in performing CIP audits

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(8) In coordination with the RCPM, lead the development of district CIP compliance policies and procedures.

(9) Provide general oversight of compliance with CIP Reliability Standards

(10) Assist in developing District's list of Critical Assets and Critical Cyber Assets

(11) Assist in developing a USACE national CIP Cyber Security Policy

(12) Document exceptions to the USACE national CIP Cyber Security Policy.


(13) Document exceptions to the District's CIP Cyber Security Policy

15. USACE Compliance Data Storage Database(s). A USACE wide database to track and store compliance data shall be developed. To the maximum extent possible this database shall be developed from one or a combination of the existing USACE corporate databases (Hydropower Gateway, OMBIL, etc.). Secure and confidential compliance data shall be stored in secure databases. Non-secure data available for public viewing shall be stored in a non-secure database.

16. Funding of USACE ACE-CME Program. Each District will determine the budget impacts for each compliance requirement and submit during the normal budget process.

FOR THE COMMANDER:

3 Appendices
Appendix A – List of Acronyms
Appendix B – Figures
Appendix C – Typical Appointment
Memoranda


STEPHEN L. HILL
Colonel, Corps of Engineers
Chief of Staff

APPENDIX A

LIST OF ACRONYMS

ACE-CME	Army Corps of Engineers - Compliance Monitoring and Enforcement (Program)
ACE-IT	Army Corps of Engineers – Information Technology
AR	Army Regulation
BA	Balancing Authority
BLM	Business Line Manager
BPS	Bulk Power System
BPS-CSSM	Bulk Power System Cyber Security Senior Manager
BPA	Bonneville Power Administration
CIP	Critical Infrastructure Protection
CMEU	Compliance Monitoring and Enforcement Unit
COE	Corps of Engineers
DC	District Commander
DE	District Engineer
DIRECT	District Implemented Reliability Compliance Team
EP	Engineer Pamphlet
ER	Engineer Regulation
ERO	Electric Reliability Organization
ES	Executive Signatory
FERC	Federal Energy Regulatory Commission
GO	Generator Owner
GOP	Generator Operator
HQUSACE	Headquarters United States Army Corps of Engineers
IASO	Information Assurance Security Officer
IS	Information System
MSC	Major Subordinate Command
NERC	North American Electric Reliability Corporation
OC	District/Division Office of Counsel
PDT	Project Delivery Team
PMA	Federal Power Marketing Agency
PROJECT	Hydropower Field Project or Field Plant
PSE	Purchasing-Selling Entity
RC	Reliability Coordinator
RCMEU	Regional Compliance Monitoring and Enforcement Unit
RCPA	Reliability Compliance Program Administrator
RCPM	Reliability Compliance Program Manager
RCS	Reliability Compliance Standard
RE	Regional Entity

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REP	Representative
RI	Responsible Individual
RP	Resource Planner
RSAW	Reliability Standard Auditors Worksheet
SAR	Standard Authorization Request
SEPA	Southeastern Power Administration
SOP	Standard Operating Procedure
SOW	Statement of Work
SWPA	Southwestern Power Administration
TO	Transmission Owner
TOP	Transmission Operator
TS	Transmission Service
TSP	Transmission Service Provider
USACE	United States Army Corps of Engineers
WAPA	Western Area Power Administration

APPENDIX B

FIGURES

Figure 1 – U.S. Army Corps of Engineers Compliance Monitoring
and Enforcement Program Organization Chart

Figure 2 – ACE-CME Program Oversight Committee Organization Chart

Figure 3 – Southeastern Regional Compliance Monitoring
and Enforcement Unit Organization Chart

Figure 4 – Southwestern Regional Compliance Monitoring
and Enforcement Unit Organization Chart

Figure 5 – Western Regional Compliance Monitoring
and Enforcement Unit Organization Chart

Figure 6 – District Implemented Reliability Compliance Team
Organization Chart

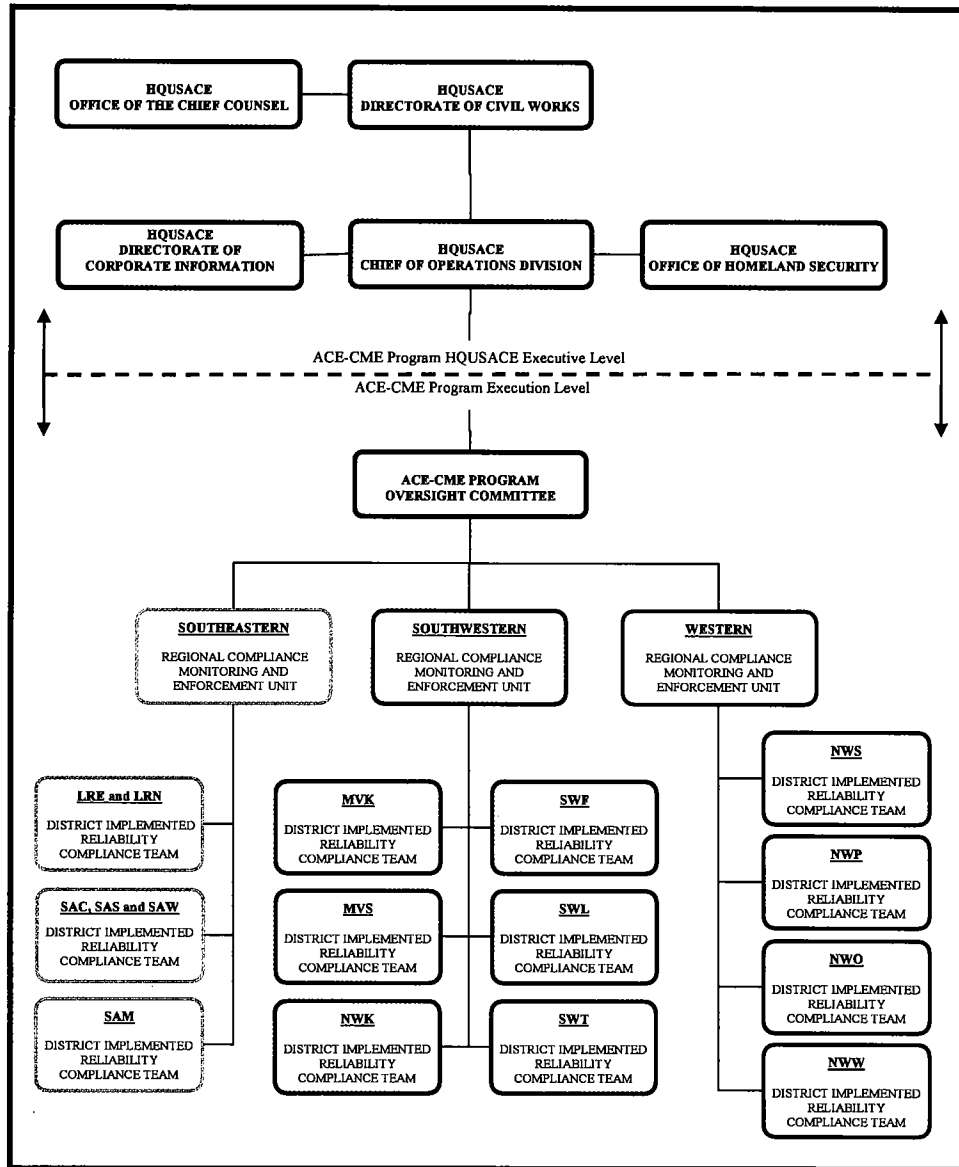


FIGURE 1

**U.S. ARMY CORPS OF ENGINEERS
COMPLIANCE MONITORING AND ENFORCEMENT PROGRAM
ORGANIZATION CHART**

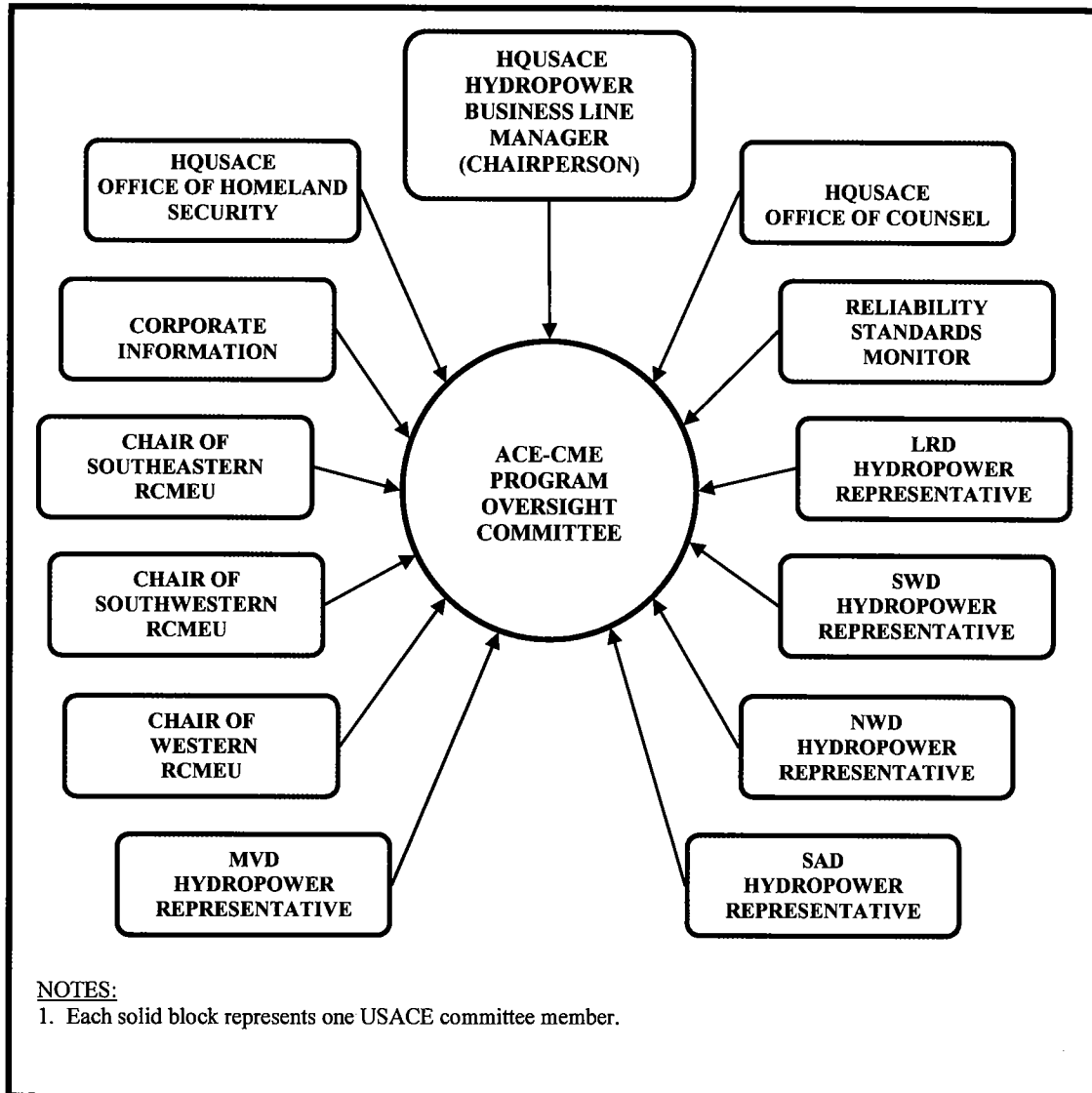


FIGURE 2

**ACE-CME PROGRAM OVERSIGHT COMMITTEE
ORGANIZATION CHART**

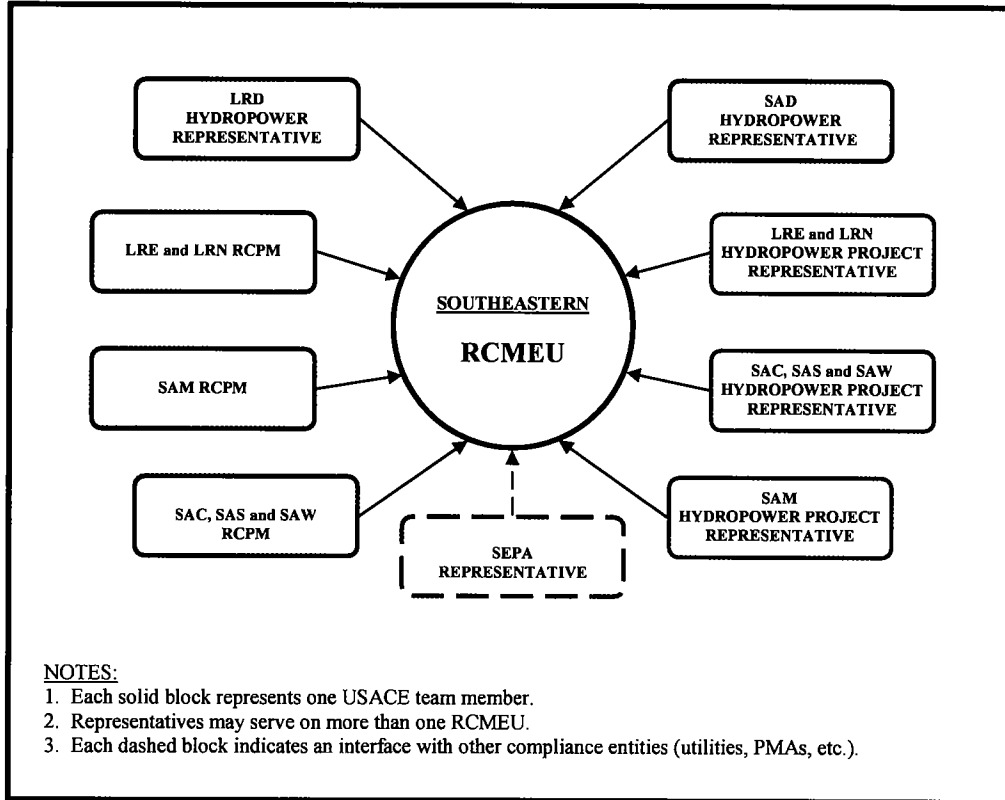


FIGURE 3

**SOUTHEASTERN
REGIONAL COMPLIANCE MONITORING AND ENFORCEMENT UNIT
ORGANIZATION CHART**

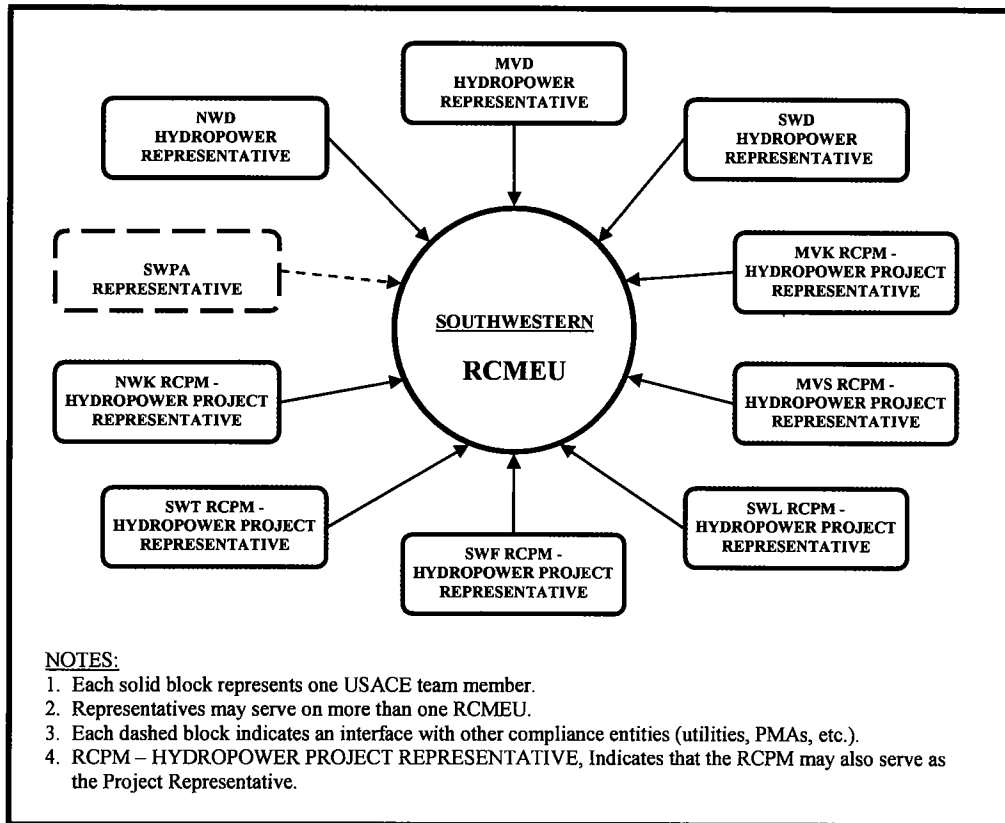


FIGURE 4
SOUTHWESTERN
REGIONAL COMPLIANCE MONITORING AND ENFORCEMENT UNIT
ORGANIZATION CHART

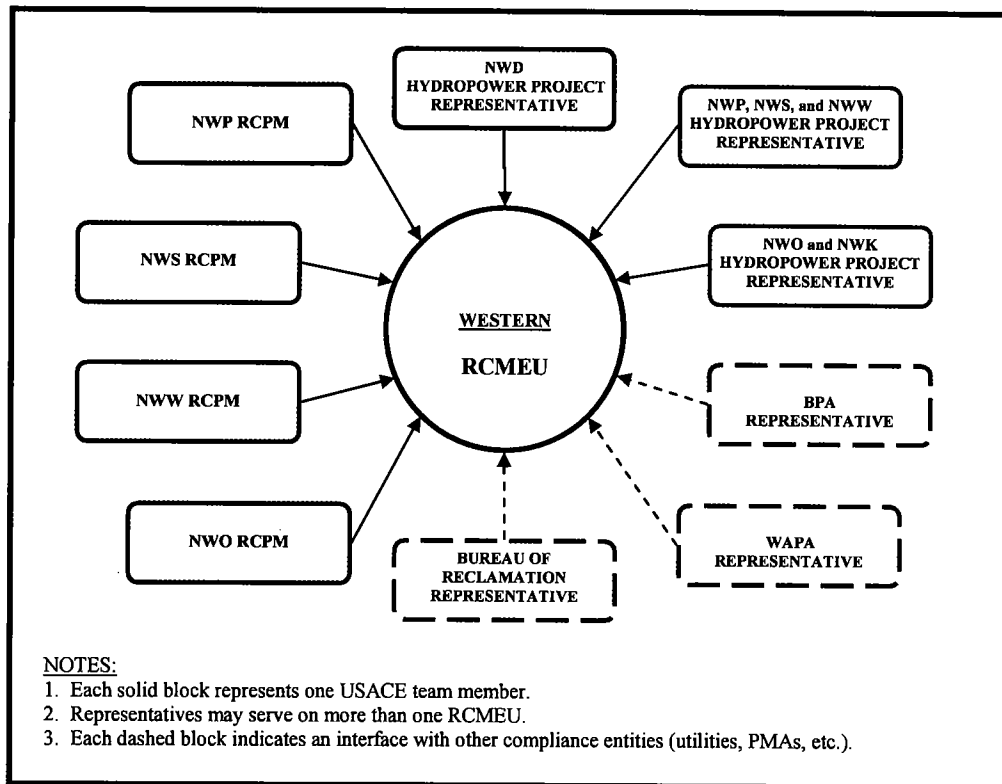


FIGURE 5

**WESTERN
REGIONAL COMPLIANCE MONITORING AND ENFORCEMENT UNIT
ORGANIZATION CHART**

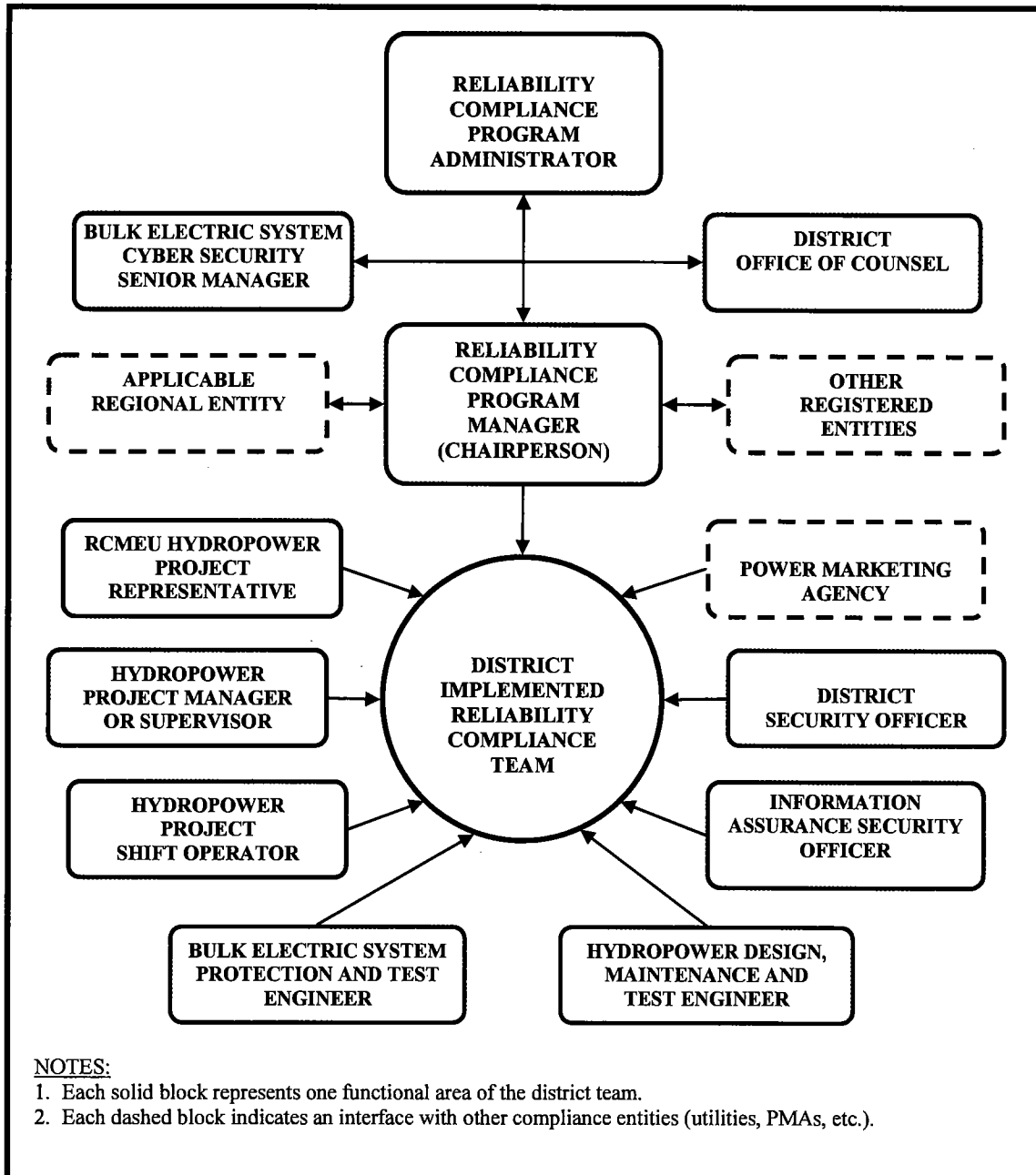


FIGURE 6

DISTRICT IMPLEMENTED RELIABILITY COMPLIANCE TEAM ORGANIZATION CHART

APPENDIX C

TYPICAL APPOINTMENT MEMORANDUM – SAMPLE #1
(Print on USACE Command or District Letterhead)

OFFICE SYMBOL (Appointing Authority)

MEMORANDUM FOR RECORD.

SUBJECT: Appointment of Reliability Compliance Program Manager

1. POSITION TO WHICH APPOINTED.

In accordance with the policies and guidelines stated in the Army Corps of Engineers Compliance Monitoring and Enforcement (ACE-CME) Program you are hereby appointed to serve in the capacity of Reliability Compliance Program Manager (RCPM) for the USACE - (district name) District.

2. APPOINTEE CONTACT INFORMATION.

*John A. Doe
Electrical Engineer
USACE - (district name) District
Office Street Address
Any City, ST. 12345
(123) 456-7890
John.a.doe@usace.army.mil*

3. APPOINTEE RESPONSIBILITIES.

As the Reliability Compliance Program Manager, you shall serve as the District's authorized representative on issues related to compliance with the Federal Energy Regulatory Commission (FERC) approved Bulk Power System Reliability Compliance Standards. You shall also serve as the Chair of the District Implemented Reliability Compliance Team (DIRECT). You are advised to review and adhere to guidance provided in ER 1130-2-551 and EP 1130-2-551 to adequately perform the duties to which you have been assigned.

FOR THE COMMANDER:

SIGNATURE BLOCK

Commander, Corps of Engineers
(district name)

4. ACKNOWLEDGEMENT OF APPOINTMENT.

I acknowledge and accept the position and responsibilities defined above.

Printed Name (Appointee)

Signature/Date (Appointee)

EP 1130-2-551

30 Sep 09

TYPICAL APPOINTMENT MEMORANDUM – SAMPLE #2

(Print on USACE Command or District Letterhead)

OFFICE SYMBOL (Appointing Authority)

MEMORANDUM FOR RECORD

SUBJECT: Appointment of Bulk Power System Cyber Security Senior Manager

1. POSITION TO WHICH APPOINTED.

In accordance with the policies and guidelines stated in the Army Corps of Engineers Compliance Monitoring and Enforcement (ACE-CME) Program you are hereby appointed to serve in the capacity of Bulk Power System Cyber Security Senior Manager (BPS-CSSM) for the USACE - (district name) District.

2. APPOINTEE CONTACT INFORMATION.

*John A. Doe
Chief, Operation Division
USACE - (district name) District
Office Street Address
Any City, ST. 12345
(123) 456-7890
John.a.doe@usace.army.mil*

3. APPOINTEE RESPONSIBILITIES.

As the Bulk Power System Cyber Security Senior Manager, you shall serve as the District's Senior Manager and authorized representative for issues related to compliance with Federal Energy Regulatory Commission (FERC) approved Critical Infrastructure Protection Bulk Power System Reliability Compliance Standards. You are advised to review and adhere to guidance provided in ER 1130-2-551 and EP 1130-2-551 to adequately perform the duties to which you have been assigned.

FOR THE COMMANDER:

SIGNATURE BLOCK

Commander, Corps of Engineers
(district name)

4. ACKNOWLEDGEMENT OF APPOINTMENT.

I acknowledge and accept the position and responsibilities defined above.

Printed Name (Appointee)

Signature/Date (Appointee)

TYPICAL APPOINTMENT MEMORANDUM – SAMPLE #3
(Print on USACE Command or District Letterhead)

OFFICE SYMBOL (Appointing Authority)

MEMORANDUM FOR RECORD

SUBJECT: Appointment of Information Assurance Security Officer

1. POSITION TO WHICH APPOINTED.

In accordance with the policies and guidelines stated in the Army Corps of Engineers Compliance Monitoring and Enforcement (ACE-CME) Program you are hereby appointed to serve in the capacity of Information Assurance Security Officer (IASO) for the USACE - (district name) District.

2. APPOINTEE CONTACT INFORMATION.

John A. Doe
Chief, Operation Division
USACE - (district name) District
Office Street Address
Any City, ST. 12345
(123) 456-7890
John.a.doe@usace.army.mil

3. APPOINTEE RESPONSIBILITIES.

As the Information Assurance Security Officer, you shall serve as the Districts' authorized representative and be responsible for coordinating the compliance of the SCADA and/or control systems with the Federal Energy Regulatory Commission (FERC) approved Critical Infrastructure Protection Bulk Power System Reliability Compliance Standards and applicable Army Regulations. You are advised to review and adhere to guidance provided in AR 25-2, ER 1130-2-551 and EP 1130-2-551 to adequately perform the duties to which you have been assigned.

FOR THE COMMANDER:

SIGNATURE BLOCK

Commander, Corps of Engineers
(district name)

4. ACKNOWLEDGEMENT OF APPOINTMENT.

I acknowledge and accept the position and responsibilities defined above.

Printed Name (Appointee)

Signature/Date (Appointee)

EP 1130-2-551

30 Sep 09

TYPICAL APPOINTMENT MEMORANDUM – SAMPLE #4

(Print on USACE Command or District Letterhead)

OFFICE SYMBOL (Appointing Authority)

MEMORANDUM FOR RECORD

SUBJECT: Appointment of Reliability Standards Monitor

1. POSITION TO WHICH APPOINTED.

In accordance with the policies and guidelines stated in the Army Corps of Engineers Compliance Monitoring and Enforcement (ACE-CME) Program you are hereby appointed to serve in the capacity of Reliability Standards Monitor for the HQUSACE Compliance Program.

2. APPOINTEE CONTACT INFORMATION.

*John A. Doe
Chief, Operation Division
USACE - (district name) District
Office Street Address
Any City, ST. 12345
(123) 456-7890
John.a.doe@usace.army.mil*

3. APPOINTEE RESPONSIBILITIES.

As the Reliability Standards Monitor, you shall be responsible for continually monitoring the compliance industry for new Federal Energy Regulatory Commission (FERC) approved and pending Bulk Power System (BPS) Reliability Compliance Standards that may impact the ACE-CME program. As a subject matter expert on FERC approved standards, you shall provide general guidance to the USACE Compliance community of practice on issues related to new and pending compliance standards. You are advised to review and adhere to guidance provided in ER 1130-2-551 and EP 1130-2-551 to adequately perform the duties to which you have been assigned.

SIGNATURE BLOCK

HQUSACE Hydropower BLM,
Corps of Engineers

4. ACKNOWLEDGEMENT OF APPOINTMENT.

I acknowledge and accept the position and responsibilities defined above.

Printed Name (Appointee)

Signature/Date (Appointee)

GLOSSARY

Compliance - For the purpose of this document, the term “compliance” is understood to mean “voluntary compliance” with applicable Federal Energy Regulatory Commission approved Bulk Power System Reliability Standards. The District is performing and has all the necessary documentation and processes in place that are required to be in compliance with the standard.

Executive Signatory – An officer, employee, attorney or other authorized representative of the Registered Entity responsible for signing Compliance Reports and other submissions.

Note 1 – NERC or the Compliance Enforcement Authority may require the Executive Signatory to provide a statement of the basis of his or her authority to sign on behalf of the Registered Entity.

Note 2 – For the purpose of this EP each District Commander shall serve as the Executive Signatory for their respective district.

Power Review of Operations and Maintenance – (1) Comprehensive review of facility performance of operations and maintenance in compliance with regulations, standards and directives. (2) Provides periodic assessment of each power facility to evaluate the application and effectiveness of the Power Operations and Maintenance Program. The program evaluates the local Operations and Maintenance Program performance and accomplishments against measurable program goals and performance standards.

Responsible Individual – The Responsible Individual (RI) is the designated person within the District responsible for specific tasks as defined within the District’s Compliance Plan. The RI may be anyone from the RCPA to a power plant operator depending on the task to be accomplished.