

# Compliance Consulting Services



The purpose of the *SOS Intl* Compliance Consulting Practice is to help our clients deal with a range of organizational and operational initiatives, from creating an organizational culture of compliance to preparing for audits from NERC and the eight Regional Entities. Additionally, since the focus of NERC's compliance program is to improve reliability of the bulk power system, our clients recognize the importance of ensuring the right practices are in place to help reduce the likelihood of system disturbances.

The NERC Compliance process includes compliance monitoring, compliance enforcement, and due process. One of the key activities of the NERC compliance effort is enforcement. As of January 31, 2010 there have been 3855 violations since June 18, 2007. **Preventing and dealing with violations is a key concern of our clients.** For the entirety of our practice, no client has received a violation as a result of our advice.

Our consulting practice is client-centric, and our staff is well educated and experienced with all aspects of compliance. We have conducted more than 60 successful consulting engagements throughout North America for all entity registrations, in all eight regions, and for all types of utility organizations.

## Services Available

### Compliance Gap Analysis –

- Expert consultants compare your documentation and evidence with what is required with each applicable NERC standard
- The analysis of the resulting compliance gap provides a roadmap for filling the gaps
- Recommendations are then made to strengthen current documentation

### Documentation Development –

- SOS experienced technical writers can write company policies and procedures
- Compliance-related documentation, such as a vegetation management plan, can also be developed

**Mock Audit** – Our compliance consultants conduct a mock audit consistent with NERC and regional audits. This process includes:

- Interviews with key personnel
- Review of current documentation and evidence
- On-site debriefing with key stakeholders at conclusion of audit
- Tips for a successful audit for clients who have not undergone an audit

**Compliance Training** – Our compliance and training experts can build any level of organizational compliance training, including

online training or classroom-type presentations. The most popular topics are:

- What is NERC & the NERC functional model
- Overview of the importance of compliance, including compliance enforcement
- The corporate compliance statement, and how the organization values and polices for compliance, e.g., executive support for compliance and how internal compliance violations are addressed
- NERC Standards of the client company, and their implications for particular departments or jobs

**Culture of Compliance Consulting** – The Federal Energy Regulatory Commission (FERC), which is the sanctioning body for NERC standards violations, has stated that it expects to see a “culture of compliance” in place and in force for each registered entity.

FERC's Policy Statement on Compliance says in part, “the most important (factor) in determining the amount of the penalty is the seriousness of the offense and the strength of the entity's commitment to compliance.”

Our expert staff uses the FERC Policy Statement on Compliance to help clients create an organizational culture of compliance by:

- Defining the compliance program
- Disseminating information
- Training appropriate personnel
- Identifying measurable targets.

**SME Coaching** – We work directly with your SMEs and compliance staff to prepare for NERC and Regional compliance audits. The purpose of this interview preparation service is to:

- Familiarize the audit participants and key stakeholders with the process of a compliance audit
- Share with the client generally accepted practices of what to say and how to present evidence



**NERC**  
NORTH AMERICAN ELECTRIC  
RELIABILITY CORPORATION

SOS Intl. and NERC ID SOS\_INTL\_001 is recognized by the North American Electric Reliability Corporation as a continuing education provider who adheres to NERC Continuing Education Program Criteria.

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