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## NERC O&P Compliance that Works at Plant Level

A plant can meet its dispatch targets, keep major equipment available, and still be exposed if its NERC O&P compliance program lives in binders, spreadsheets, or tribal knowledge. That gap shows up fast during an event review, a self-certification cycle, or a spot check where evidence has to match what the plant actually does. For Generator Owners and Generator Operators, the real standard is not whether a procedure exists. It is whether the requirement is built into normal work, consistently performed, and defensible.

That is where many generation organizations run into trouble. Operations & Planning requirements are not difficult only because of the standards themselves. They become difficult when responsibilities are split across operations, maintenance, engineering, outage planning, and compliance, with no shared structure tying them together. A program that looks complete on paper can still fail under routine plant conditions.

### What NERC O&P compliance actually demands

NERC O&P compliance is often treated like an administrative function, but at the asset level it is an operating discipline. The requirements touch how a facility documents operating processes, manages communications, trains personnel, responds to system conditions, and retains evidence. For registered entities, especially Generator Owners and Generator Operators, the work is tied directly to reliable performance and documented execution.

That matters because compliance failures rarely come from not knowing a standard exists. More often, they come from inconsistent implementation. A procedure may be technically correct but not aligned with actual control room practice. An operator task may be performed correctly every time, but the supporting evidence may be incomplete or stored in three different places. A maintenance or engineering change may improve the plant while creating a gap in a procedure, training matrix, or evidence trail.

The practical challenge is that O&P compliance sits in the middle of real operational constraints. Staffing changes, outage schedules, equipment issues, and market pressures do not stop because a requirement has a quarterly or annual cadence. Good programs account for that reality instead of assuming ideal conditions.

### Why plant-level integration matters in NERC O&P compliance

The strongest compliance programs are designed around how the plant already operates. That does not mean forcing standards into existing practices without scrutiny. It means mapping each requirement to accountable roles, repeatable workflows, and records that can be produced without a scramble.

At a combined-cycle facility, for example, evidence collection may involve control room logs, shift turnover records, alarm response documentation, operating procedures, training files, and maintenance management system outputs. If those sources are disconnected, compliance becomes reactive. If they are intentionally aligned, the plant can support both reliability and audit readiness without adding unnecessary administrative drag.

This is also where generic programs tend to break down. A fleet-level template may establish baseline consistency, which is useful. But if it ignores site-specific operating practices, staffing models, or technology differences, the result is a compliance program that operators and supervisors work around instead of using. In generation, that is a warning sign.

A plant-level approach usually performs better because it answers practical questions early. Who owns each requirement? What triggers the task? What record proves it happened? Where is that record kept?

What changes when staffing, equipment, or control systems change? Those answers are what make a program usable.

## **The difference between documented and defensible**

Many organizations are documented. Fewer are defensible.

A documented program may include procedures, matrices, and calendars. A defensible program shows that responsibilities are current, procedures reflect actual practice, evidence is complete, exceptions are addressed, and personnel understand what they are expected to do. Defensibility is what matters when a regulator, internal reviewer, or leadership team asks not just what the process says, but how the plant knows it was followed.

That distinction becomes more important after organizational change. New ownership, turnover in plant leadership, transition to third-party operations support, or changes in fleet structure often leave behind legacy compliance artifacts. Those materials may still exist, but they do not always reflect current operating reality.

## **Where generation facilities commonly struggle**

The recurring issues are usually not mysterious. They come from predictable friction points between compliance structure and plant execution.

One common issue is unclear ownership. When operations assumes compliance is tracking evidence, and compliance assumes operations owns the full requirement, tasks can fall into the gap. Another is overreliance on one experienced employee who knows the history of a requirement but has not translated that knowledge into a controlled process. That may work until vacation, retirement, or an unexpected event exposes the dependency.

Evidence management is another weak point. Plants often have the right information, but not in a form that supports efficient retrieval or consistent retention. Screenshots, email trails, log entries, and manually saved files can become difficult to reconcile if naming conventions, storage locations, and review practices are inconsistent.

Procedure drift is also common. Plants evolve. Control systems are updated, operating strategies change, and staffing patterns shift. If compliance documents do not keep pace, the site can end up with procedures that are technically approved but operationally stale. During an audit or event analysis, that mismatch is hard to defend.

Training adds another layer. Annual or periodic training requirements are rarely solved by assigning a slide deck and collecting attendance records. Effective programs connect training to plant responsibilities, procedure changes, and operating scenarios personnel actually face.

## **Why more paperwork is not the answer**

When gaps appear, the first reaction is often to add forms, checklists, or extra reviews. Sometimes that is appropriate. Often it just creates more burden without improving control.

A better response is to simplify the path from required action to retained evidence. If a task already occurs during shift turnover, outage planning, or operator rounds, the program should use that existing workflow where possible. If a record already exists in a controlled system, duplicating it in a separate compliance file may add effort with little value unless there is a clear retention or retrieval reason.

This is one of the main trade-offs in NERC O&P compliance. More structure can improve consistency, but too much structure can cause workarounds, late entries, or superficial completion. The right balance depends on the plant, the staffing model, and the maturity of the existing program.

## **Building a NERC O&P compliance program that holds up**

A durable program usually starts with a disciplined gap assessment. Not a checklist exercise, but a requirement-by-requirement review of applicability, existing controls, evidence paths, ownership, and known weak points. For generation organizations, that work is most useful when performed against actual site practices rather than assumed corporate processes.

The next step is control design. Each requirement should connect to a specific operating or administrative process with named accountability. That includes procedure ownership, task cadence, review expectations, evidence retention, and escalation paths when something is missed or conditions change. Clarity matters here because ambiguity creates silent failure points.

From there, documentation should support execution, not just audit appearance. Procedures, matrices, and trackers need to be understandable to the people using them at the plant. If a control room supervisor cannot quickly tell what must happen, when it must happen, and what record proves completion, the design is too abstract.

Ongoing maintenance is just as important as initial development. Standards interpretations change. Plant configurations change. Personnel change. A compliance program that is not periodically tested against current conditions will degrade, even if it was well designed on day one.

## **What good support looks like**

For many organizations, outside support is most valuable when it bridges compliance knowledge and plant knowledge. That means more than translating standards language. It means understanding how generators, auxiliary systems, operating procedures, outage schedules, and staffing realities affect compliance execution.

A hands-on partner can help identify where a requirement is already being met but poorly documented, where a process needs redesign, and where a site is carrying unnecessary burden because of legacy controls that no longer fit. That kind of work tends to be more effective than a purely theoretical review because it produces a program the plant can actually sustain.

Ascendant Energy Solutions approaches this work with that plant-level focus. The objective is not to create a compliance layer separate from operations. It is to build an integrated program that supports reliability, stands up to scrutiny, and remains usable by the people responsible for executing it.

## **Audit readiness is a byproduct of operating discipline**

Plants sometimes treat audit readiness as a special project. In practice, the strongest audit posture comes from routine discipline. When responsibilities are clear, records are controlled, procedures match the field, and periodic reviews catch drift early, audit preparation becomes verification rather than reconstruction.

That does not mean audits are easy. It means the site is not dependent on last-minute evidence hunts or memory-based explanations. It also improves resilience when an event occurs, because the plant can show not only what happened, but how its control framework was designed and maintained.

For operations and compliance leaders, that is the real value of a mature O&P program. It reduces avoidable exposure without pulling the plant away from its primary mission. If your current approach



depends on heroic effort, isolated knowledge, or document collections that nobody trusts, the issue is probably not effort. It is program design. A better structure pays for itself every time the plant has to prove that reliable performance and compliance are working together.

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