

D2SI Update

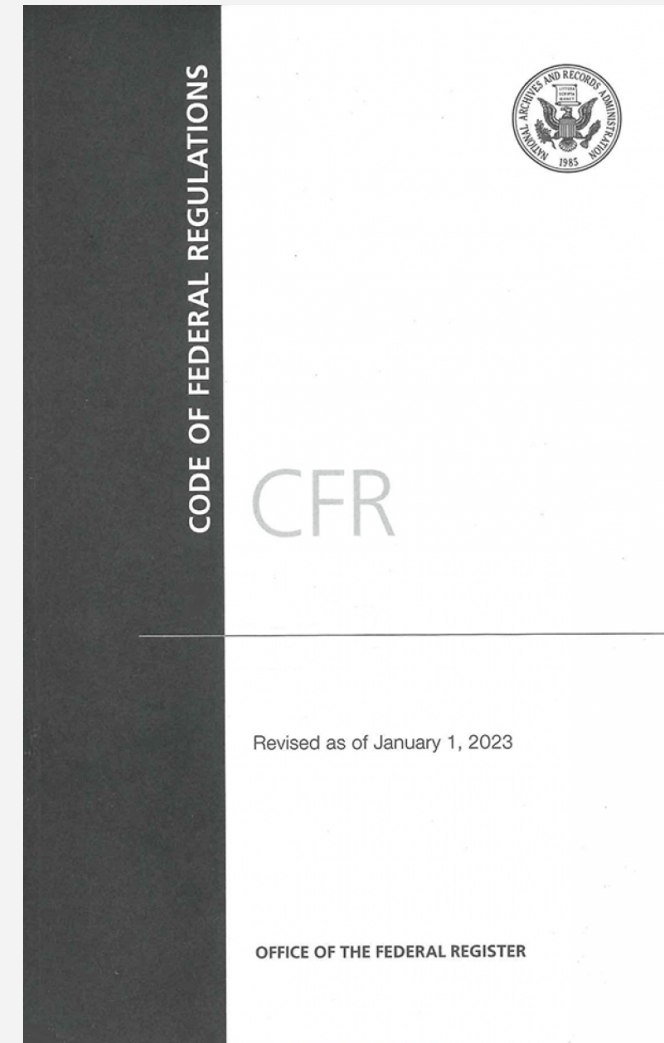
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18 CFR 12 Revisions

In April 2022, through FERC Order No. 880, 18 CFR 12 was revised. Among the revisions were modifications to subpart D of Part 12 (Part 12D) that included revisions to the Independent Consultant inspection requirements, formally incorporating Potential Failure Mode Analysis (PFMA), and the addition of Level 2 Risk Analysis (L2RA).



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Year 1 Overall Assessment of Comprehensive Assessments (CAs)

- Better than anticipated
- In any new process, certainly expected some rough areas
 - Many Inspection Plans required resubmittal
 - Some Pre-Inspection Preparation Reports (PIPRs) required quick responses to maintain project schedules
 - Revised PFMA process and new L2RA process took a bit longer to complete than expected
 - CA report documentation was more involved
- Some of this resulted in requesting and granting extensions of time to complete



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CA Status Summary

	Reports Due in FY24	Reports Due in FY25	Reports Due in FY26
Total number of CAs	28	40	46
Number of Inspection Plans received	27	32	1
Number of Inspection Plans accepted	27	18	1
PIPRs received	26	1	0
PFMA/L2RAs currently in progress	1	0	0
Pending CA reports	12	0	0
CA reports received	11	0	0
CA review meetings conducted	6	0	0



Data as of March 4, 2024



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