ADVISORY SERIES · EC-WP-702

The Hidden Cost of Over-Staffed Support

Why adding more compliance support staff often produces worse compliance outcomes.

Over-staffed compliance engagements look like depth and operate like fragmentation. The entity reads a long roster as bench strength. What it has bought is coordination overhead, slower decisions and diluted accountability. This reference explains where that cost hides and what a better engagement structure looks like.

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Foreword

This professional reference is one of a series Energy Compliance, Inc. publishes for registered entities and the people who run their compliance programs.

I have spent more than thirty years on every side of the bulk electric system. I have operated control centers as a Reliability Coordinator, Transmission Operator, and Power System Operator. I have audited grid facilities and signed off on findings as a senior compliance auditor. I have worked enforcement matters from inside the regulator's process. For the last several years I have advised registered entities directly through the firm I founded.

The entities that do reliability well share a common habit. They take the standards seriously without confusing them with reliability itself. They know that a NERC Reliability Standard is a floor, not a ceiling. They know that compliance is something an auditor evaluates, while reliability is something a system either delivers or does not. And they prepare for audits by building programs that survive real questions, not binders that look thick.

That is the perspective these references try to share. Each one takes a single topic, whether a standard family, an operational function, a regulatory framework, or an emerging industry challenge, and walks through how it actually works.

These references are written for the compliance manager who wants to understand the system, not just memorize requirements. For the legal counsel who has to brief a board

honestly. For the senior operator who has been told that compliance and reliability are the same thing and suspects they are not. And for the new compliance hire who was handed a binder and told good luck.

Energy Compliance exists because much of the consulting offered to registered entities today is structured for billable hours rather than for outcomes. Every engagement is overseen by a senior practitioner. We do not bring five people to a meeting that needs one. We automate the work that should be automated, and we apply senior judgment to the work that requires it. If that approach is what you are looking for in a compliance partner, the back of this reference has our contact information.

If not, the reference still belongs to you. Take what is useful and apply it well. And remember the only test that ultimately matters: when the system needs to perform, does it?

Rob Smith

Founder and Principal, Energy Compliance, Inc.

Executive Summary

Over-staffed compliance engagements look like depth and operate like fragmentation. The proposal lists a partner, a manager, several senior consultants, a junior and a coordinator, and the entity reads the roster as bench strength. What the entity has actually bought is coordination overhead, decision latency, diluted accountability, and a fee structure that rewards billable utilization more than program outcomes. In my view the pattern holds across firms and across engagement types, and the cost rarely shows until the audit cycle exposes it.

The fix is not a smaller fee. It is a structurally different engagement model, one that concentrates accountability instead of spreading it thin.

- More people on an engagement does not mean better compliance. It means more coordination overhead, less accountability and slower decisions.
- The senior named on the proposal has to be the senior in the room. If not, the engagement is compromised on day one.
- Coordination overhead is the largest line item nobody bills explicitly. The entity pays for it in time, in decisions and in audit posture.
- When the team is large and the outcome is wrong, the structure makes it hard for anyone on that team to own the outcome.
- Decision latency is the silent cost of multi-consultant programs. Days become weeks, and if a notification letter arrives first, the entity can lose its self-reporting credit.
- Communication friction grows with headcount. Information loss is a property of the structure, not a personnel problem.
- The right engagement model is senior, singular and accountable. Few consulting firms are organized to deliver it.

1 The Headcount Illusion

Large teams look reassuring. The reassurance tends to last only until the engagement actually has to deliver.

1.1 The Org Chart in the Proposal

The standard proposal for a NERC compliance engagement features an org chart. A partner, a senior manager, two or three consultants, often a junior, and sometimes a coordinator whose main job is to schedule the meetings the larger team requires. The chart is meant to reassure the entity that the firm has bench strength and that no compliance question will go unanswered.

Part of that is real. The firm does have those people, and they are billable. What does not survive contact with the actual engagement is the assumption that more people on the chart produce better outcomes for the entity. The work gets done by whoever is available, with whatever context they picked up from internal handoffs, while the senior at the top of the chart manages the firm rather than the work.

1.2 Why Nobody Tests It

The illusion holds because the entity rarely tests it. Everyone attends the kickoff. The senior speaks, the manager speaks, the consultants nod. Three weeks later the entity has a specific question, and it goes to the consultant who picked it up by email, not to the senior who spoke at kickoff. The entity treats that as normal, even though it is not the model it thought it was buying when it signed the contract.

The cost arrives late. The engagement runs, deliverables get produced, and the status reports look professional. Eventually the audit cycle surfaces the gap between what the firm staffed and what it delivered. By then the entity is too far into the engagement to renegotiate the staffing model that produced the gap.

> **From the Field**
>
> A large org chart sells reassurance. Reassurance and execution are different products, and the entity is rarely sold both.
>
> The senior who spoke at kickoff is seldom the consultant who answers the email three weeks later. That is the actual engagement model.
>
> The cost of the headcount illusion waits for the audit cycle. By then the staffing decision is locked in.

2 Coordination Overhead vs Execution

Every consultant added to an engagement adds coordination overhead. The overhead is not trivial, and the entity pays for all of it.

2.1 What Coordination Costs

Coordination overhead is the time and effort it takes to keep a team aligned on what each person is doing, why, which decisions have already been made, and what context the others need. On a two-person team it is small. On a six-person team it dominates. The arithmetic is simple: two people share one line of communication, while six people share fifteen. Compliance engagements ignore that arithmetic all the time.

In my experience, on a six-person engagement, a meaningful share of every billable hour goes to coordination rather than execution. Internal team meetings. Document review cycles. Email threads to agree on positioning. Prep sessions before every client conversation. None of this work shows up in the deliverable. All of it shows up on the invoice. The entity is paying the team to talk to itself, and the talking is built into the staffing model the entity agreed to.

2.2 What It Costs in Time

The entity also pays in time. A decision a single senior could make in an hour now needs a team consultation that takes a week. The team has to align internally, the senior has to be briefed, and the recommendation has to be reviewed before it goes out. Each step adds days. The entity learns to tolerate the delay because it has been told the team approach is more thorough, but in compliance the measure that matters is audit timing, and the delay works against it.

Strong engagements keep coordination overhead low by keeping the team small. One senior practitioner with the necessary context, working directly with the entity, produces fewer artifacts and more outcomes. The trade-off is real, and buyers consistently undervalue it. In my experience, entities that have tried both models seldom go back to the larger one by choice.

> **From the Field**
>
> Coordination overhead is billed in every hour, even though it never appears on the invoice under its own name.
>
> Ask the firm how many internal meetings sit behind each client meeting. That number is the overhead the entity is paying for.

3 The Accountability Vacuum

Multi-consultant engagements spread accountability thin by design. When something goes sideways, no one on the team is positioned to own the outcome.

3.1 Accountability Concentrates or Dissipates

Accountability has a structural property that compliance engagements rarely respect: it either concentrates or it dissipates. It does not spread evenly across a team unless the team is built to make one named person the owner. Most consulting teams are not built that way. They are built for billable utilization.

The result is an accountability vacuum. When the engagement produces an outcome the entity is unhappy with, the structure makes it hard to assign responsibility cleanly. The partner says the manager handled the workstream. The manager says the consultant drafted the deliverable. The consultant says the manager reviewed it. The entity is left holding a finding that nobody on the consulting side is positioned to own.

None of this is malicious. It is how multi-person engagements are organized. With several hands on every deliverable, ownership is diluted across all of them. The dilution is invisible while the work is going well and obvious the moment it fails. Entities usually discover it the first time they need to escalate, and by then the engagement is too far along to restructure.

3.2 Engineering for Accountability

A program that needs accountable consulting has to write accountability into the contract. The proposal should name the individual who owns each deliverable and whose signature matches that responsibility. The escalation path should end at one person, not a partnership committee. The senior named at kickoff should be the senior at every meeting, not only the ceremonial ones.

Firms find these terms commercially uncomfortable, which is why they are uncommon. They are also the terms that produce an engagement where someone is actually responsible.

> **From the Field**
>
> Ask the firm who owns the outcome at audit. If the answer is a committee, treat that as the warning.
>
> When the engagement produces a bad outcome, the structure makes responsibility hard to assign. That is how it was built to work.
>
> Engineered accountability takes uncomfortable contract terms. A firm that resists those terms is telling the entity exactly what kind of engagement it is proposing.

4 Decision Latency in Multi-Consultant Programs

Multi-consultant engagements run slower than single-senior engagements. The latency comes from the structure, and the entity pays for it in compliance windows it cannot afford to miss.

4.1 Where the Delay Comes From

Decision latency is the gap between the moment a decision becomes necessary and the moment the engagement produces it. In my experience, in a single-senior engagement that gap is usually hours. In a multi-consultant engagement it runs to days, sometimes weeks, and process improvement inside that model does not close it.

The mechanism is simple. The consultant who first hears the question checks internally before responding. The internal check requires briefing the manager. The manager often wants the senior's view before committing the firm. Each step makes sense inside the staffing model, and each step adds delay. By the time the entity has an answer, the moment for deciding has often passed.

4.2 What Latency Costs in Compliance

In compliance, latency has a calendar attached. NERC's Sanction Guidelines (Appendix 4B to the Rules of Procedure) treat self-reporting as a mitigating factor that can reduce a monetary penalty, if the report comes within a reasonably prompt time after the entity becomes aware of the violation and before a compliance monitoring engagement detects it. The guidelines say a Self-Report should go in as soon as practical, typically within three months of discovery, and that a notification letter for an upcoming compliance monitoring engagement generally ends self-reporting credit for the requirements in scope until that engagement ends.

That window does not move because a consulting team needed an extra week to align, and an audit response that needs same-day support does not wait while the firm convenes. When latency outruns the window, the entity decides without the consultant or decides late. A single-senior engagement has no internal coordination layer. The senior hears the question, applies judgment and answers, on a cadence that matches compliance work.

> **From the Field**
>
> In my experience, decision latency runs to days on a multi-consultant engagement and to hours on a single-senior one.
>
> Self-reporting windows do not wait for the team to align. Once latency exceeds the window, the engagement stops helping where it matters most, and the fee keeps running.

5 Communication Friction and Information Loss

Information moving through several consultants degrades. Each handoff loses context, and the loss compounds over the life of the engagement.

5.1 Every Handoff Loses Something

Information passed between people loses fidelity at each handoff. The compliance question the entity asked, relayed from consultant to manager to senior, is not quite the question that reaches the senior. The answer that travels back the same way is not quite the answer the senior gave. Nobody intends this. It is simply how information moves through layers.

The compounding matters because compliance work is precision work. A control description that is accurate enough at the senior level can become inaccurate enough at the consultant level to produce a finding. An interpretation the senior would have qualified gets delivered without the qualification. Context the entity gave in the first conversation never reaches the person who actually drafts the deliverable.

5.2 The Receiving End

The entity feels this from the receiving side too. The senior's position, relayed back through the team, arrives partly as the senior's view and partly as the team's reading of it. The entity then makes decisions on that mixed input without knowing which parts came from where. When an auditor later asks about the basis for a decision, the entity cannot fully reconstruct the chain, because the chain was never visible in the first place.

Direct communication between the entity and the senior removes the friction. The catch is that the senior actually has to be available, and that conflicts with the firm's billable utilization model. The firms that resolve the conflict organize around senior access rather than team layers. They are uncommon, and they deliver engagements where information arrives intact.

> **From the Field**
>
> Information loses fidelity at every handoff. Compliance is precision work, and it cannot absorb that loss.
>
> The entity ends up deciding on mixed input it cannot fully attribute. When the auditor asks about the basis, the chain cannot be rebuilt.
>
> Direct access to the senior removes the friction. Most firm structures work against it, because billable utilization depends on the layers.

6 The Cost-vs-Outcome Mismatch

The fee for a multi-consultant engagement scales with headcount. The outcome does not, and the entity absorbs the difference.

6.1 Who the Economics Favor

The economics of a multi-consultant engagement favor the firm. The fee grows with the number of people on the team, because the firm has to bill those hours to make the engagement profitable at its preferred utilization. The entity pays for the staffing model whether or not the staffing model produces a better outcome.

Outcomes do not grow in step with headcount. They track seniority, continuity of context and accountability. A two-person engagement led by a senior practitioner often produces a stronger audit posture than a six-person engagement led by a junior with senior oversight. When it does, the smaller engagement costs less and delivers more. In my view, the larger one is still chosen more often, because its proposal looks more impressive.

6.2 The Question Leadership Asks Afterward

The mismatch turns sharp when the entity tries to justify the engagement after the fact. The fee is on the books and the deliverables are in the binder, but the audit posture is no better than it was. Leadership starts asking uncomfortable questions. Why did the engagement cost what it cost? Why is the program no easier to defend? Why is the next consulting engagement already being scoped to fix what the last one was supposed to close?

The fee follows the staffing model, while the outcome follows the senior practitioner. In most engagements the two are disconnected, and that disconnect moves value from the entity to the firm. Seeing it clearly is the first step toward choosing differently next time.

> **From the Field**
>
> The fee scales with headcount, and the outcome scales with seniority. Most engagements are sold on the wrong one.
>
> A two-person engagement led by a senior practitioner often outperforms a six-person engagement led by a junior with senior oversight. The economics rarely reward the smaller one.
>
> If the audit posture has not improved and the next engagement is already being scoped, the mismatch is doing exactly what the structure built it to do.

7 Knowledge Fragmentation

When a multi-person team works on a program, its institutional knowledge splinters across the team. When the team rotates, the pieces leave with the people.

7.1 Where the Knowledge Lives

Knowledge held by one named person can be carried into the entity. Knowledge spread across a six-person consulting team cannot. Each consultant holds a piece of the program. Some pieces are written down, but many are tacit. When the engagement ends, or when the firm rotates its people, the pieces leave with them, and the entity is left with a program it can no longer fully explain.

The fragmentation stays hidden while the engagement runs, because the team is present and the information looks coherent. Questions get answered and deliverables get produced. The entity assumes the team's collective knowledge has become its own. It has not. It sits in the heads of individual consultants who will not be on the next engagement, and the entity has built no way to bring that knowledge in-house before they leave.

7.2 When the Gap Surfaces

The cost shows up at the next personnel change. A new compliance manager joins the entity and tries to understand the program. The documentation describes the framework, and the framework points to decisions made by consultants who are no longer engaged. The reasoning behind those decisions is not in the documentation. The new manager has to reconstruct it by inference, and inference is sometimes wrong. The next audit may find the gap.

A single-senior engagement keeps the knowledge in one place the entity can question directly. The senior either documents the reasoning as the work proceeds or hands it over explicitly when the engagement closes. The entity ends up with a program whose history it can read, because that history came from one person who held all of it. Multi-person engagements seldom produce that result, since no one on the team ever held the full picture.

> **From the Field**
>
> Knowledge held by one named senior can be handed over. Knowledge split across six consultants leaves with the consultants.
>
> The fragmentation stays hidden while the team is present. It surfaces at the next personnel change inside the entity.
>
> Single-senior engagements leave programs with a readable history. Multi-person engagements rarely do, because no one held the full picture to begin with.

8 The Right Structure: Senior, Singular, Accountable

The engagement model that works is small, senior and named.

8.1 What the Model Looks Like

The model itself is straightforward. One senior practitioner with operator and regulator-side experience works directly with the entity and is accountable by name for the outcome at audit. Specialists are added narrowly when a specific specialty is needed, and only for as long as it is needed. The engagement closes when the work is done, with the program owned inside the entity rather than dependent on the consultant.

8.2 Why It Is Uncommon

The model is rare for commercial reasons that have nothing to do with the entity's interests. Firms built around senior solo practice cannot easily scale revenue. Firms built around team engagements can. In my view, the industry has selected for the team model because it funds firm growth, and entities have accepted it as the default because they assume it is the only option.

It is not. Firms that work on the senior-solo model do exist. Their proposals are shorter, the fee structure is simpler, and the accountability is unambiguous. The engagement closes when the work closes, and the entity is left with a program it owns rather than one that is serviced from outside indefinitely. That owned program is what the entity should be paying for.

8.3 Selecting Differently

Choosing the right structure means overriding procurement defaults. A larger roster does not win on the question that matters, and a lower hourly rate does not offset the total cost of coordination overhead. References from past team engagements say little about how a senior-solo engagement will perform. Evaluate against the right criteria, knowing most firms find them uncomfortable to answer honestly, and both the selection and the program that follows will change.

> **From the Field**
>
> The model that works is one senior, named and accountable.
>
> The selection shapes the engagement, and the engagement shapes the program. Choose the structure first.

Glossary

Term	Meaning in this paper
Compliance Audit	A systematic, objective review and examination of records and activities to determine whether a Registered Entity meets the Requirements of applicable Reliability Standards (NERC Rules of Procedure, Appendix 2).
Compliance Enforcement Authority (CEA)	NERC or the Regional Entity in their respective roles of monitoring and enforcing compliance with the NERC Reliability Standards (Appendix 2).
Compliance Monitoring and Enforcement Program (CMEP)	The NERC Compliance Monitoring and Enforcement Program, Appendix 4C to the NERC Rules of Procedure, or a Regional Entity's FERC-approved program; also the NERC or Regional Entity organization that performs compliance monitoring and enforcement (Appendix 2).
Coordination overhead	As used in this paper, the time a consulting team spends keeping its own members aligned rather than doing the client's work.
Decision latency	As used in this paper, the gap between the moment a compliance decision becomes necessary and the moment the engagement delivers it.
Mitigating Activities	Actions taken by a Registered Entity to correct and prevent recurrence of a noncompliance, whether or not the actions are embodied in a Mitigation Plan (Appendix 2).
Notice of Penalty	A notice prepared by NERC and filed with FERC, following approval by NERC of a notice of Confirmed Violation or a settlement agreement, stating the penalty or sanction imposed or agreed to (Appendix 2).
Registered Entity	An owner, operator, or user of the Bulk Power System, or the entity registered as its designee for the purpose of compliance, that is included in the NERC Compliance Registry (Appendix 2).
Self-Report	A report by a Registered Entity stating that it believes it has, or may have, violated a Reliability Standard (Appendix 2). Under the Sanction Guidelines, a prompt Self-Report made before detection can reduce a monetary penalty.
Single-senior engagement	As used in this paper, an engagement led and delivered by one named senior practitioner who is accountable for the outcome, with specialists added only for defined tasks.

How Energy Compliance Can Help

This paper argues for one senior, named, accountable practitioner on every engagement. Energy Compliance, Inc. is built that way. Every engagement is led by Rob Smith personally, and the work is scoped to the entity's role, function and bulk system impact. The services that fit the problems in this paper:

- **Regulator-perspective program reviews.** A senior read of your program the way an auditor will read it, including whether the knowledge behind past decisions actually lives inside your organization (Chapter 7).
- **Compliance program design and improvement.** Building the program so the reasoning, ownership and evidence stay with the entity when any consultant, ours included, steps away.
- **Mitigation planning and Self-Report development.** Fast, single-point decisions on possible noncompliance, so the self-reporting window in Chapter 4 is not lost to internal alignment.
- **Audit defense.** Audit and enforcement support, including Notice of Penalty response and settlement posture, with the same senior on the file from first question to close.

WattOps Compliance is EC's NERC compliance evidence platform, at wattopscompliance.com. If Chapter 7 describes your program, start with the evidence. EC will run one standard at one facility through WattOps at no cost (CIP standards excluded), so you can see where your evidence stands without a six-person kickoff.

RenewOps is EC's renewable operations monitoring and analytics platform, with a Data Center module. For entities running renewable fleets or data centers, the same principle applies to operations data as to compliance knowledge: it should sit with the entity, not with whoever on a team last touched it.

If you want one senior on the problem instead of a roster, call or write. The first conversation is with a senior practitioner.

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About the Author

Rob Smith is the Founder and Principal of Energy Compliance, Inc., with more than thirty years in the industry on every side of the system. He began in control-room operations as a Reliability Coordinator, Transmission Operator, and Power System Operator across RTO/ISO and utility control centers. On the regulator side, he was a senior compliance auditor and subject matter expert for NERC Reliability Standards. He audited grid facilities, evaluated mitigation adequacy, participated in risk-based oversight of utility mitigation activities, and supported the development of violation notifications and settlements in FERC-directed enforcement actions. He conducted a regulatory audit in the Sultanate of Oman against the Sultanate's Sector Law and Grid Code.

He founded Energy Compliance, Inc. to deliver senior regulator-side compliance authority without the layered staffing and billable-hour overhead of larger firms.

Education:

- MBA, Energy Management, University of Mary
- MSL, Compliance Law, Fordham Law University
- BAS, Energy Management, Bismarck State College
- BAS, Mechanical Engineering, Metallurgy minor, University of Florida
- BAS, Criminology, St. Petersburg College (State Law Enforcement Certification)
- AAS, Power Plant Technology, Bismarck State College
- AAS, Electrical Transmission System Technology, Bismarck State College

Certifications: NERC Lead Auditor training; previously NERC-certified at the Reliability Coordinator level; 1st Class A Boiler Engineer License, Minnesota.

About Energy Compliance, Inc.

Energy Compliance, Inc. is an independent consulting and advisory firm based in Bloomington, Minnesota, focused exclusively on electric reliability, cybersecurity reliability, and regulatory compliance for organizations connected to the North American Bulk Electric System.

Our work supports registered entities, including Generator Owners and Operators, Transmission Owners and Operators, Reliability Coordinators, Balancing Authorities, and Distribution Providers. We work across NERC Reliability Standards, FERC orders, RTO/ISO market participation rules, Regional Entity oversight, and state regulatory frameworks.

We do this work differently than larger consulting firms. Engagements are overseen by a senior practitioner with regulator-side experience. We staff for outcomes, not billable hours. Our deliverables are written to be operationally executable and audit-defensible, and every one is structured for the auditor's question rather than the consultant's binder. Where automation can replace manual work, we build the automation. Where senior judgment is required, the senior is in the room.

Services

Energy Compliance services include, but are not limited to:

- NERC reliability and compliance advisory support
- NERC compliance program support, interpretation, and audit preparation
- Senior advisory: direct engagement on complex reliability questions
- Reliability governance and program assessments
- Registration and applicability analysis
- Operational and engineering reliability alignment
- Compliance program design and improvement

- Audit and enforcement support (non-advocacy)
- Audit defense: Notice of Penalty response and settlement posture
- Mitigation planning and Self-Report development
- Training and executive briefings on reliability frameworks
- Regulator-perspective program reviews
- Industry engagement: standards development and working-group participation
- WattOps Compliance, EC's NERC compliance evidence platform (wattopscompliance.com)
- RenewOps, EC's renewable operations monitoring and analytics platform, with a Data Center module

Each engagement is scoped to the entity's role, function, and bulk system impact.

Energy Compliance is not affiliated with, sponsored by, or endorsed by the North American Electric Reliability Corporation, the Federal Energy Regulatory Commission, or any Regional Entity. Learn more at energycomplianceinc.com.

Sources and Authorities

- North American Electric Reliability Corporation, Sanction Guidelines of the North American Electric Reliability Corporation, Appendix 4B to the NERC Rules of Procedure (effective January 19, 2021), Section 3.3, Mitigating Factor: Disclosure of the Violation Through Self-Reporting and Voluntary Mitigating Activities by the Entity, and footnotes 6 to 8. https://www.nerc.com/globalassets/who-we-are/rules-of-procedure/appendix-4b.pdf
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