FEDERAL ENERGY REGULATORY COMMISSION
DOCKET NO. RR14-___

NORTH AMERICAN ELECTRIC RELIABILITY CORPORATION

DRAFT ATTACHMENT 4

TO

FIVE-YEAR
ELECTRIC RELIABILITY ORGANIZATION
PERFORMANCE ASSESSMENT REPORT

NERC CONSIDERATION OF INDUSTRY FEEDBACK

JULY 21, 2014

The Stakeholder Survey requested comments on the following broad categories:

1. Reliability Standards
2. Compliance Operations
3. Enforcement
4. Registration and Certification
5. Reliability Assessment & Performance Analysis Metrics
6. Training, Education and Personnel Certification
7. Event Analysis
8. Critical Infrastructure Protection
9. Stakeholder Communications, Public Relations, and IT
10. Business Plan and Budget
11. Independence and Stakeholder Input

The following table features two distinct columns. This first column contains summaries of key stakeholder critiques expressed through comments. The second column lists the specific location within the Five Year Assessment where those critiques are addressed. The table is divided into sections that correspond to the broad categories of questions asked in the Stakeholder survey.

Summary of Key Stakeholder Critique	Where Critique is Addressed[1]
Reliability Standards Questions	
Speed up the process for developing Reliability Standards.	II(A)(2)
Better articulate how prioritization is determined in the Reliability Standards development process.	II(A)(1)(a),(b),(c) II(A)(2)
Provide greater clarity regarding the "Applicability" section of each Reliability Standard.	II(A)(3)
Clarify avenues to obtain information regarding the development history of Reliability Standards.	II(A)(3)
Provide greater transparency regarding the process for selecting Standard Drafting Teams and the rationale for Standard Drafting Team decision making.	II(A)(1)(c) II(A)(2)
Streamline and enhance communications regarding the development of Reliability Standards to be more useful to industry.	II(A)(3)
Provide a detailed explanation as to how the Standards improve reliability for the industry.	II(A) II(A)(4)(b)
Consider equally or more effective tools than a Reliability Standard for emerging issues such as Geomagnetic Disturbances (GMD), new Critical Infrastructure Protection threats such as coordinated physical attack, cold weather preparedness, etc.	II(A)(4)(d)
Do not use the procedures set forth in NERC alerts and advisories to establish quasi-standards.	[II(A)(d)]

---

[1] Unless otherwise indicated, all references are to the Five-Year Electric Reliability Organization Performance Assessment Report, Overview of NERC Activities and Accomplishments in the Five-Year Period.

Continue to integrate recommendations of the Reliability Issues Steering Committee into NERC's decision making.	II(A)(2)(b)
Consider alternatives such as the forum process, which engages asset owners, to address reliability issues.	I.B II(A)
Compliance Operations	
Provide better oversight to ensure consistency in auditing practices.	II(C)(2)(a) II(C)(4)(c)-(d)
Provide greater clarity on RAI to inform industry about what is expected.	II(C)(2)(a)-(b)
Improve communications regarding how entities are to demonstrate compliance by making them more substantive, timely, and useful to the industry.	II(C)(2)
Reassess the role of Compliance Application Notices ("CANs") in an audit.	[(II)(A)(d)]
Make RSAWs available before, during, and after the balloting process and ensure that they do not exceed the scope of the Requirement.	[(II)(A)(d)]
Ensure that compliance guidance tools like Case Notes, Compliance Analysis Reports (CARs), CANs and Bulletins are used for guidance only, and not as vehicles for interpretations of or revisions to Reliability Standards.	[(II)(A)(d)]
Better communicate and emphasize the benefits of self-reporting.	II(C) II(C)(2)(b)
Offer more unified, coordinated, and user-friendly IT tools and programs to Registered Entities.	Attachment [•][2] II.B.2.b.ii-ix (*Compliance Monitoring Tools and Procedures/Maintaining Confidentiality*)
Streamline the audit process to create greater efficiencies.	II(C)(2)(a) II(C)(4)(c)-(d)
Provide small entities with additional guidance regarding scoping their internal self-assessments and programs.	II(C)(2)
Require self-certifications only for quarters in which a misoperation occurred, rather than for every quarter.	II(A)(4)(c)
While efforts are outlined in the report regarding a transition to a risk-based approach for compliance and enforcement, including discretion, targeted measurable improvements are still needed.	II(C)(4)(a)
Clarify how registered entities will be impacted by improvements to RAI.	II(C)(2)
While some regions are already employing RAI-like approaches in audits and other compliance enforcement activities, all regions should be implementing an ERO-wide program as soon as possible.	II(C)(2)
Clarify how NERC's compliance monitoring and enforcement efforts have matured into a "robust program that provides industry with more certainty on actions, outcomes, and reliability consequences."	II(C)(2) II(C)(4)
Enforcement	
Treat similar findings with greater consistency.	II(C)(4)(b)
Streamline and refine the scope of investigations.	Attachment [•] II(C)

---

[2] Attachment [•] to the Five-Year Electric Reliability Organization Performance Assessment Report, NERC Evaluation of Regional Entities.

	IV(A)
Increase the timeliness of enforcement processing.	II(C)(4)(a)
Provide greater transparency and detail regarding penalty calculation and enforcement in general.	II(C)(4)(b) Attachment [•] II(D)(1)(d)
Treat repeat violations that could not have been prevented by any of the mitigating activities approved by the Region and NERC similarly as non-repeat violations.	II(C)(2)(b)
Provide sufficient details regarding the different tracks for disposition of compliance issues, and explain how the CEA will make the determination as to which is the proper track for disposition. Also, explain how the oversight roles will be administered between the CEA Compliance Staff, the CEA Enforcement Staff, NERC, and FERC.	II(C)(4)(b) Attachment [•] II(D)(1)(d)
Associate timeframes with CEA actions to be taken during the disposition process. This will provide a tracking measure to help expedite processing of low reliability risk violations.	II(C)(4)(a)
Do not issue penalties for administrative violations.	II(C) II(C)(1) II(C)(2)(b)
While NERC has made progress toward reducing its caseload through "Find, Fix, Track" (FFT) and the bulk processing of violations, effort should be made to reduce time spent by the Registered Entities.	II(C) II(C)(1) II(C)(2)(b)
Clarify how registered entities will be impacted by improvements to FFT.	II(C) II(C)(1) II(C)(2)(b)
Describe the efficiency and effectiveness of the compliance and enforcement programs and their impact on reliability in light of the high percentage of lower risk violations.	II(C)(2)(b)
Registration and Certification	
Enhance the System Operator Certification Program by making training for exam preparation more available.	[•]
Provide greater clarity, guidance, and consistency regarding Coordinated Functional Registration ("CFR") and Joint Registration Organizations ("JROs"), and examine how the process can be streamlined.	II.B.1 Attachment [•] II.A
Registration should be more carefully tailored and based on sounder reasoning.	II(B)(1)-(2)
Update the functional model to provide greater clarity and guidance to Registered Entities.	II(B)(1)-(2)
Provide additional clarification, guidance, and training regarding the definition of the terms Bulk Power System ("BPS") and Bulk-Electric System ("BES"), and the distinction between them, to ensure consistent application in both Reliability Standards and the Compliance Registration process.	II(B)(2)
The risk-based registration concept must be carefully developed and implemented to ensure that entities that remain registered are not adversely impacted.	II(B)(1)-(2)

Reliability Assessment & Performance Analysis Metrics	
Better articulate the need for a new Reliability Standard before development.	II(A)(2)(a)-(b)
Develop performance measures to determine if a Reliability Standard is actually reducing risk to reliability.	II(A) II(A)(4)(b)
Explain more thoroughly how the information provided in Reliability Assessments affects the future adequacy and reliability of the BPS.	II(D) II(D)(2)
Provide metrics that focus not only on enforcement but also measure performance risk and specify specifically what is working and what is not.	VII.2
Describe the basis for including the 345-kV breaker failures as a potential trend in risk prioritization.	II(D)(2)
Provide a more complete explanation of how "the daily severity risk index" is used to help prioritize risks.	I.A [•]
Training, Education, and Personnel Certification	
Increase the availability and accessibility of training regarding audit preparation, Reliability Standard compliance, Event Analysis, and major NERC initiatives like BES and CIP Version 5.	[II(A)(d)] II(A)(4)(a) II(B)(2) II(C)(2)(a) Attachment [•] II.B.2.b, II.B.2.b (i) – (ix) (*Guidance and Training for Industry Stakeholders*)
Incorporate Registered Entity Independent Subject Matter Experts ("ISMEs") into the audit process.	[II(A)(d)] Attachment [•] II(A)(B)(2)(b)(i)-(ix) (*Department Structure / Staffing / Conflict of Interest Avoidance*)
Event Analysis Questions	
Separate Event Analysis from Compliance Operations.	[II.D.3]
Increase the efficiency and clarity of the compliance assessment process associated with an event.	II.D.3 Attachment [•] IV.C
Streamline the cause coding mechanism.	II.D.3 Attachment [•] IV.C
Increase the timeliness, transparency and comprehensiveness of dissemination of information relating to Event Analysis and "Lessons Learned."	II.D.3 Attachment [•] IV.A IV.C
Improve the consistency of the NERC Alert system by ensuring that Alert levels are commensurate with the risk of the issue presented and do not impose unnecessary burdens on Registered Entities.	[II(D)(2)(2)] Attachment [•] II.C
Ensure that sabotage events are communicated by NERC Alert.	[II(D)(2)(2)]

Make improvements in full publication of events (under appropriate confidentiality controls) to users, owners and operators.	II(D)(3)
Consider that not all issues identified by the EA Program are issues that should become standards or even alerts.	II(D)(3)
Critical Infrastructure Protection Questions	
Increase the focus on physical security, in addition to cybersecurity.	II(A)(4)
Increase the speed at which Registered Entities will be able to learn how CIP standards will be interpreted by auditors, and ensure that these interpretations are consistent across the Regions.	II(A)(7)(g)
Provide additional guidance with alerts that will help avoid public disclosure request responses with CIP-related information.	II(A)(7)(g)
Explore a full functional separation of NERC and the ES-ISAC as recommended in the February 2014 Report from the Co-chairs of the Bipartisan Policy Center's Electric Grid Cybersecurity Initiative.	[•]
Strengthen inter-sector coordination: the ES-ISAC should explore ways to provide information and support the activities of the Electricity Sub-Sector Coordinating Council (ESCC).	II(F)(e) [•]
Stakeholder Communications, Public Relations, and IT	
Provide greater consistency between NERC and Regional Entity websites.	VII [•]
Improve tech support, accessibility and organization of the NERC website.	VII [•]
Reduce travel expenses for Registered Entities by more frequently changing locations where meetings are held (beyond Atlanta), and increasing the availability of webinars and teleconferences.	I.B
Improve retention of NERC staff to ensure better, less disruptive functioning of the ERO.	[•]
Increase the consistency and clarity of the communications of NERC leadership regarding the end-state vision and progress of major ERO initiatives.	VII
Make processes for developing documents related to compliance more transparent and open to stakeholder feedback.	II(C)(2)(a)-(b)
Increase the specificity of the ERO strategic plan.	VII [•]
Improve and streamline external communications to make them more useful and accessible to stakeholders.	VII
Further engage Canadian entities on preparing and verifying information in Attachment 1 regarding NERC's efforts to seek recognition in Canada.	VII Attachment 1[3] I(6)
Business Plan and Budget	
Provide presentations to Registered Entities that demonstrate maximum efficiency in the use of ERO resources.	[•]

---

[3] Attachment 1 to the Five-Year Electric Reliability Organization Performance Assessment Report, Discussion of How NERC Meets the ERO Certification Criteria of 18 C.F.R. §39.3(b).

Extend the time by which stakeholders have an opportunity to provide input into the business plan and budget, and increase the clarity of projected costs.	[•]
Permit greater incorporation of policy input from the MRC into the business plan.	[•]
Indicate that certain non-statutory requirements were transitioned out of the NERC Business Plan and Budget.	[•]
Provide more detail around the growth in NERC's budget, stakeholders' enduring concerns, and NERC's plans to control costs going forward.	[•]
Independence and Stakeholder Input	
Provide an explanation regarding the use of the term BES in certain instances and BPS in other instances.	[•]

The following table features two distinct columns. This first column contains summaries of key stakeholder critiques of the Regional Entities expressed through comments. The second column lists the specific location within the Five Year Assessment where those critiques are addressed. The table is divided into sections that correspond to the broad categories of questions asked in the Stakeholder survey.

Summary of Key Stakeholder Critique of Regional Entities	Where Critique is Addressed
Reliability Standards Questions	
Improve the dissemination of information by providing additional information regarding evolving Reliability Standards.	Attachment [•][4] I.A; II.B.2.a Many Regional Entities have committed more resources in order to engage in additional training, education, and outreach activities to assist registered entities with their compliance and enforcement responsibilities. These increased activities have included additional workshops, newsletters to industry, and other direct communications.
Compliance Operations	
Improve the speed and consistency of CIP compliance audits.	Attachment [•] II.B.2.b An important goal of the Reliability Assurance Initiative (RAI) is to develop standard audit policies and procedures for all Regional Entities to serve as a common baseline approach to compliance audits. NERC and the Regional Entities have developed a standardized audit checklist to ensure consistent application of audit procedures across the Electric

---

[4] Attachment [•] to the Five-Year Electric Reliability Organization Performance Assessment Report, NERC Evaluation of Regional Entities.

	Reliability Organization ("ERO") and will engage in robust training when these tools are finalized.
Enhance the quality, consistency, and accessibility of compliance training.	Attachment [•] II.B.2.b (generally); *see also* II.B.2.b (i) – (ix) (*Guidance and Training for Industry Stakeholders*) Feedback from registered entities regarding training workshops has generally been positive. To address requests from the industry for an increased level of compliance information, many Regional Entities have committed more resources to training. Training activities during the assessment period have included in-person workshops, webinars, training videos and recordings, compliance update letters, on-site visits, and individualized outreach to registered entities.
Ensure that compliance audits are carried out in an efficient, accurate, consistent, and professional manner, and that the procedures and methodology followed by auditors are clear and ultimately useful to the registered entity.	Attachment [•] II.B.1.d; II.B.2.b During the assessment period, NERC and the Regional Entities have increased training opportunities for audit staff. Through RAI, NERC and the Regional Entities are working together to enhance the clarity and consistency of audit practices across the ERO enterprise.
Better communicate to the registered entity how to become compliant.	Attachment [•] II.B.2.b (generally); *see also* II.B.2.b (i) – (ix) (*Guidance and Training for Industry Stakeholders*) and II.D.2.c.ii-iii – II.D.9.ii-iii (*Ensuring the Timely Mitigation of Violations/Promoting Reliability through Enforcement Philosophy and Practices*) In addition to workshops and webinars intended for a broad audience, the Regional Entities offer individualized outreach opportunities to the registered entities within their regions to help facilitate compliance with Reliability Standards. Enforcement and mitigation staff at the Regional Entity also work with registered entities to develop and implement effective, appropriate mitigating activities to both address the noncompliance and prevent recurrence.

Increase the quality and consistency of compliance-related IT applications.	Attachment [•] II.B.2.b.ii-ix (*Compliance Monitoring Tools and Procedures/Maintaining Confidentiality*) The Regional Entities are currently exploring ways to enhance their compliance-related IT applications. Several Regional Entities have implemented enhancements, which are described in the individual assessments.
Streamline self-report and enforcement resolution processes.	Attachment [•] II.D.1.a The Regional Entities have worked to streamline their enforcement processes during the assessment period. NERC and the Regional Entities developed and implemented streamlined enforcement processing mechanisms, such as the Spreadsheet Notice of Penalty ("SNOP") and Find, Fix, Track and Report ("FFT") program, which allowed for a marked increase in enforcement processing rates. Through regular communication and the oversight activities of NERC, NERC and the Regional Entities work to develop and share efficiency-enhancing process improvements. These improvements include the Self-Report User Guide and the aggregation program, which were developed under RAI.
Better articulate the CIP Reliability Standards compliance and performance expectations.	Attachment [•] II.B.2.b (generally); *see also* II.B.2.b (i) – (ix) (*Guidance and Training for Industry Stakeholders*) and Overview of NERC Activities and Accomplishments[5] II.A.4.a. In addition to their regular training and outreach to Registered Entities, the Regional Entities are working with NERC to identify challenges and best practices for transitioning to Version 5 of the CIP Reliability Standards. The results of a transition implementation study will inform a report that will be broadly shared among industry and stakeholders.

---

[5] Five-Year Electric Reliability Organization Performance Assessment Report, Overview of NERC Activities and Accomplishments in the Five-Year Period.

Ensure that guidance tools like Case Notes, CARs, CANs, etc., are consistent and useful to registered entities, but do not become vehicles to reinterpret or revise Reliability Standards outside of the stakeholder process.	Overview of NERC Activities and Accomplishments [II.A.d] (*Concurrent Development of Compliance Assessment Tools*) NERC and Regional Entity staff are coordinating on the development of Reliability Standard Audit Worksheets as new Reliability Standards are developed. By creating a uniform understanding of compliance expectations for each Reliability Standard early in the development process, the need for interpretations or other forms of compliance guidance should be reduced.
Consider ways to improve the clarity and utility of RSAWs.	Overview of NERC Activities and Accomplishments [II.A.d] See response to immediately preceding comment.
Enforcement	
Increase transparency regarding the process by which penalties and sanctions are calculated and assigned, and the reasoning behind the calculation and assignment of those penalties and sanctions.	Attachment [•] II.D.1.d, II.D.2.d– II.D.9.d (individual Regional Entity *Implementation of Various Aspects of the CMEP*) Each of the Regional Entities has taken steps to increase the transparency regarding its penalty determination processes through the assessment period. Each of the Regional Entities follows the NERC *Sanction Guidelines*, and each penalty is reviewed to ensure consistency with other penalties assessed across the ERO Enterprise for similar violations occurring under similar facts and circumstances.
Streamline and hasten the enforcement process so as to make it more efficient and reduce the cost burden on registered entities.	Attachment [•] II.D.1.a The Regional Entities have worked to streamline their enforcement processes during the assessment period. NERC and the Regional Entities developed and implemented streamlined enforcement processing mechanisms, such as SNOP and FFT, which allowed for a marked increase in enforcement processing rates. Through regular communication and the oversight activities of NERC, NERC and the Regional Entities work to develop and share efficiency-enhancing process improvements. These improvements include the Self-Report User Guide and the aggregation program, which were developed under RAI.

Address the backlog in violation processing.	Attachment [•] II.D.1.b(i)-(iii) By the end of the assessment period, NERC and the Regional Entities processed over 99% of violations discovered from 2007-2011 (excluding on hold violations). NERC and the Regional Entities are working to ensure that all violations are processed before reaching 24 months in age.
Better communicate why violations occurred so registered entities can learn from them.	II.D.2.c.ii-iii – II.D.9.ii-iii (*Ensuring the Timely Mitigation of Violations/Promoting Reliability through Enforcement Philosophy and Practices*); Attachment [•] II.B.2.b (generally); *see also* II.B.2.b (i) – (ix) (*Guidance and Training for Industry Stakeholders*) In the event a registered entity is found to be noncompliant with one or more Reliability Standards, enforcement and mitigation staff at the Regional Entity will work with the registered entity to develop and implement effective, appropriate mitigating activities to both address the noncompliance and prevent recurrence. Compliance and enforcement staff at the Regional Entities also conduct workshops, webinars, and individualized outreach opportunities to help facilitate compliance with Reliability Standards.
Expand the use of FFTs.	Attachment [•] II.D.1.b.iv In 2013, NERC and the Regional Entities worked together to expand the FFT program and implement certain enhancements approved by the Commission. As a result of these enhancements, FFT treatment is now available for a limited pool of Possible Violations posing a moderate risk to the reliability of the BPS (in addition to Possible Violations posing a minimal risk). In addition, certain unmitigated Possible Violations may be processed through the FFT program, so long as mitigation is completed within 90 days from the date the FFT is posted. Additional FFT enhancements may be implemented in the future under RAI.

Enhance consistency regarding enforcement processing across the regions.	Attachment [•] II.D.1.a.vi, II.D.1.d NERC and the Regional Entities engage in a number of activities to enhance consistency. For example, each of the Regional Entities have participated in RAI development activities and the multi-region working group on enforcement activities. In addition, NERC conducts certain oversight activities to facilitate the consistent application of streamlined enforcement processing mechanisms and other enforcement-related processes under the Compliance Monitoring and Enforcement Program ("CMEP"). Further, NERC and the Regional Entities take steps to promote reasonable consistency in the application of monetary penalties.
Registration and Certification	
Increase the clarity, regional consistency, quality, and overall efficiency of the Coordinated Functional Registration ("CFR") and Joint Registration Agreement ("JRO") process.	Attachment [•] II.A ; Overview of NERC Activities and Accomplishments II.B.1 The JRO and CFR mechanisms are important components of the NERC Organization Registration and Certification Program. Amendments to the NERC ROP have clarified the operations of both types of registration. In addition, the Regional Entities began using consistent registration forms during the assessment period.
Incorporate CFRs into compliance software.	[•] Enhancements to compliance-related applications are being considered by the Regional Entities.
Reduce redundancies in the registration and certification processes.	Attachment [•] II.A ; Overview of NERC Activities and Accomplishments II.B.1 During the assessment period, the Regional Entities began using consistent registration forms. In addition, a Regional Entity working group developed a prototype Common Registration Form which will provide greater assurance that all entities that should be registered are in fact registered. Two initiatives are underway to improve registration and certification processes: the first pertains to multi-regional registered entities. The second is the risk-based registration effort, which will improve the efficiency with which a Regional Entity is able to

	process registration activation and deactivation requests.
Better communicate the requirements for certification and re-certification.	Attachment [•] II.A ; Overview of NERC Activities and Accomplishments II.B. See response to immediately preceding comment.
Increase clarity and guidance surrounding how entities are registered by NERC, and respond timely to deregistration inquiries.	Attachment [•] II.A ; Overview of NERC Activities and Accomplishments II.B. See response to immediately preceding comment.
Reliability Assessment & Performance Analysis Metrics	
Ensure that the Regional Entity self-assessments are consistent by using consistent criteria and trigger points.	Attachment [•] III.B.2 Each Regional Entity's self-assessment is distributed to Regional Entity members of the NERC Reliability Assessment Subcommittee (RAS) for an in-depth and comprehensive review of the data and information. Peer reviewer comments are discussed with Regional Entity and assessment area representatives, and refinements and adjustments are made, as needed. The Regional Entity self-assessments are then subjected to scrutiny and review by the entire RAS. This peer review process provides an essential check and balance to ensure the validity of the information provided for each assessment. It also provides a mechanism for the members of the RAS to become fully convinced that each Regional Entity self-assessment is accurate, thorough, and complete.
Training, Education, and Personnel Certification	
Increase the availability, quality, and accessibility of training regarding audit preparation and Reliability Standard compliance.	Attachment [•] II.B.2.b (generally); *see also* II.B.2.b (i) – (ix) (*Guidance and Training for Industry Stakeholders*) and Overview of NERC Activities and Accomplishments II.C.2.a. To address requests from the industry for an increased level of compliance information, many Regional Entities have committed more resources to training. Training activities during the assessment period have included in-person workshops, webinars, training videos and recordings, compliance update letters, on-site visits, and individualized outreach to registered entities. In addition, the Regional Entities are working with NERC to develop and implement certain improvements to audit processes under RAI. These

	improvements should provide additional insight for registered entities into how they will be audited and what they can do to prepare.
Event Analysis Questions	
Increase the speed by which EA information (including lessons learned) is disseminated.	Attachment [•] IV.A In June 2010, NERC and the Regional Entities created the NERC Event Analysis Working Group (EAWG). The EAWG expended significant efforts to develop an ERO Event Analysis process for use across North America. In 2012, following field trials and after considering the extensive feedback provided by registered entities, the EAWG developed the ERO Event Analysis Process. By integrating industry engagement and the collaborative review of disturbances into the ERO Event Analysis process, the effectiveness, predictability, consistency, and timeliness of the program was increased. Several lessons learned have already been shared with industry.
Improve the quality of disseminated EA information by showing relative and key emerging risks based on data analyzed through EA processes and by releasing more meaningful lessons learned.	Attachment [•] IV.C NERC is considering improvements to increase the timeliness, transparency, and comprehensiveness of dissemination of information relating to event analysis and lessons learned.
Better coordinate information requests when NERC and a Regional Entity are involved in an event investigation.	Attachment [•] IV.C In response to suggestions received during the ERO Event Analysis annual review, NERC is exploring potential solutions (including the possibility of implementing enterprise IT systems) to provide efficiencies in event analysis and related reporting processes.
Increase the effectiveness and efficiency of ERO-wide EA communications, particularly as to when an event is closed out.	Attachment [•] IV.A NERC and the Regional Entities are continuously refining the ERO Event Analysis process based on experience and as system conditions change.

Stakeholder Communications, Public Relations, and IT	
Make Regional Entity websites more accessible, user-friendly, secure, and useful to registered entities.	Attachment [•] II.B.2.b (i) – (ix) (*Guidance and Training for Industry Stakeholders/Confidentiality*) The Regional Entities post a number of compliance and technical materials to assist registered entities in their compliance program implementation. In addition, the Regional Entities use encryption and other methods to ensure that information submitted through Regional Entity websites is secure.
Business Plan and Budget	
Increase transparency regarding the funding mechanisms for Regional Entities when they undergo reorganization.	Attachment [•] V.B. Since NERC became the ERO, NERC and the Regional Entities have continuously striven for improved transparency and detail in the business plans and budgets. To provide ongoing, collaborative oversight of the business planning, budgeting, accounting, and financial reporting processes, NERC and the Regional Entities have formed an ERO Finance Group comprised of representatives of NERC and each Regional Entity.