

Standards, Compliance, and Enforcement Bulletin

January 22-28, 2018

INSIDE THIS EDITION

Active Standards Postings | Other Active Comment Periods | Standards News | General Compliance and Enforcement News |

Other News | Standards Subject to Future Enforcement | Board of Trustees and FERC Action | Upcoming Events |

About the SC&E Bulletin

ACTIVE STANDARDS POSTINGS

Current and Upcoming Ballots (ballo	t periods close at 8:00 p.m. Eastern)		
Project	Action	Start Date	End Date
- /			
Join Ballot Pools (ballot pool windows close at 8:00 p.m. Eastern)			
Project	Action	Start Date	End Date
Posted for Comment			
Project	Action	Start Date	End Date
<u>Project 2017-05 – NUC-001-3 Periodic Review</u> Preliminary Team Recommendation	<u>Comment Period</u>	12/15/17	01/29/18
Project 2017-04 – Periodic Review of INT Standards Templates	<u>Comment Period</u>	01/10/18	02/23/18



OTHER ACTIVE COMMENT PERIODS

Posted for Comment			
Posting	Action	Start Date	End Date
Comment Period Open for Methods for Establishing IROLS Draft Reliability Guideline: The NERC Methods for Establishing IROLs Task Force (MEITF) has developed a Reliability Guideline that provides guidance and technically sounds methods for the electric power industry in establishing Interconnection Reliability Operating Limits (IROLs). This effort was undertaken at the request of the NERC Planning and Operating Committees to support the NERC Project 2015-09 Standard Drafting Team (SDT). The guideline provides an overall framework and detailed technical reference material related to the assessment of System Instability, Uncontrolled Separation, and Cascading to ensure Reliable Operation of the BPS. Each of the three concepts related to Reliable Operation are discussed in depth, including analysis techniques and considerations that should be made when determining how they may contribute to the establishment of an IROL. Recommended practices and techniques are described using example simulations and actual system studies to clearly articulate the concepts. The overall IROL framework is also described in detail to ensure consistent terminology when discussing IROLs.	Submit comments via email using the comment form.	12/13/17	01/29/18
Project 2015-09 SDT is actively working on revisions to existing NERC FAC Standards (namely FAC-010, FAC-011, and FAC-014) involved in the establishment of IROLs. These standards are currently in development, and the MEITF coordinated its activities with the proposed changes being made by the SDT. The majority of			



recommended practices and technical material in the draft guideline are agnostic to these changes and focus on the analytical techniques for establishing IROLs; however, some aspects of the recommended framework are aligned with changes being proposed by the SDT. In particular, the guideline aligns with the concepts that IROLs are established in the operations horizon and information regarding			
stability limitations are provided from Planning Coordinators to Reliability Coordinators.			
Comment Period Open for Cyber Intrusion Guide for System	Submit comments via email using the	12/15/17	01/29/18
Operators Draft Reliability Guideline: The NERC Operating Reliability Subcommittee (ORS) developed the draft Reliability Guideline: Cyber	comment form.	12, 13, 17	01/23/10
Intrusion Guide for System Operators, which is intended to assist System Operators in detecting and responding to potential cyber			
security incidents and provides guidance on when to activate your entity-specific incident reporting procedures.			
The NERC Operating Committee reviewed the initial draft of the guideline at its December 2017 meeting and approved it for a 45-day industry comment period.			
A draft version of the guideline has been posted on the NERC website			
for industry comment. Comments are to be submitted via email by			
January 29, 2018 at 5:00 p.m.ET using the "Reliability Guideline: Cyber Intrusion Guide for System Operators – Comment Form."			
NERC Seeks Industry Input for Standards Efficiency Review: NERC is	Submit the completed spreadsheet to	12/13/17	02/02/18
seeking industry input on potential requirements that could be	Chris Larson.	12/13/17	02,02,10
retired from the existing body of Reliability Standards. This input will			
be provided to the new Standards Efficiency Review (SER) Teams for			
their consideration in the SER project. Phase 1 of the SER project will			



focus on Operations & Planning Standards, though NERC is collecting industry input for all standards including CIP.

The project scope evaluates NERC Reliability Standards using a risk-based approach to identify potential efficiencies through retirement or modification of Reliability Standard Requirements. Considering that many Reliability Standards have been mandatory and enforceable for more than ten years in North America, this project seeks to identify potential candidate Requirements that are not essential for reliability, could be simplified or consolidated, and could thereby reduce regulatory obligations and/or compliance burden. Each SER team should be composed of individuals that combined represent a broad range of experience, including engineering, operations, compliance, and legal.

Evaluation Criteria for Retiring Reliability Standards Requirements:

- Requirement acts as a control to support compliance with another Requirement
- Requirement regulates a high volume of Low Risk activity
- Compliance evidence for the Requirement is not needed greater than 90 days to achieve reliability
- Requirement exists to prove that an event or incident did not happen or to prove a negative
- Data retention obligation for the Requirement can be significantly reduced



 Requirement is a candidate for coverage in NERC Certification Program (e.g. the Requirement pertains to basic functionality of registered entity) Other proposed criteria from industry For Requirements that you feel are candidates for retirement, please provide sufficient justification for the SER Teams. Use the spreadsheet, which has separate tabs for Operations & Planning and CIP Requirements, to provide your input. 			
Comment Period Open for Power Plant Model and Verification Testing for Synchronous Machines Draft Reliability Guideline: The development and verification of steady-state and dynamic models that accurately represent the equipment installed in the field is a critical component of planning and operating the bulk power system. The draft Reliability Guideline covers an array of testing considerations, procedures, and how those tests help derive or verify model parameters, as related to MOD-025-2, MOD-026-1, and MOD- 027-1 Reliability Standards. The guideline describes tests that may need to be performed for generating facilities depending on specific situations (e.g., commissioning, development of a baseline model, and model verification). In addition to the dynamic model verification processes, the inter- related aspects of generator protection coordination (PRC-019-2) and generator capability testing (MOD-025-2) are considered in the guideline.	Submit comments via email using the comment form.	01/10/18	02/23/18

STANDARDS NEWS

There is no additional Standards news to report for this week.

Quick Links

Register in the SBS
Projected Standards Posting Schedule
Project Tracking Spreadsheet
Standards Related Questions – Single Portal
2017–2019 Reliability Standards Development Plan
Quality Review Application

GENERAL COMPLIANCE AND ENFORCEMENT NEWS

NEW Webinar Resources Posted

The ERO Enterprise recently conducted an industry webinar regarding the Compliance Guidance program and, more specifically, guidelines for developing Implementation Guidance. The webinar was tailored to Pre-Qualified Organizations, Standard Drafting Team members, and any other personnel involved in the development of Implementation Guidance. A new Implementation Guidance Development Aid was introduced during the webinar. The slide presentation, webinar recording, and the new Implementation Guidance Development Aid are now available.

Quick Links

Risk-Based CMEP

CIP V5 Transition Program

ERO Enterprise Program Alignment Process

Consistency Reporting Tool (EthicsPoint)

Risk-Based Registration Initiative

Reliability Standard Audit Worksheets

Enforcement & Mitigation: Enforcement Actions

UPDATED Future Actions for Compliance Application Notices, Process Bulletins, and Directives Document Posted

The ERO Enterprise has over time issued a number of supplementary documents to address questions about compliance with Reliability Standards and requirements. Such documents include <u>Compliance Process Bulletins</u>, <u>Compliance Application Notices (CANs)</u>, and <u>Compliance Directives</u>, as posted on <u>NERC's Compliance Tools and Auditor Resources web page</u>.



Upon review by the ERO Enterprise and with input from the Compliance and Certification Committee, certain CANs, Process Bulletins, and Directives are no longer applicable to the effective Reliability Standards, are outdated, or are covered under NERC Rules of Procedure, and will be retired and archived during the week of February 19, 2018.

NERC has posted a <u>Future Actions for Compliance Application Notices</u>, <u>Process Bulletins</u>, and <u>Directives document</u>, which contains the complete list of affected documents and rationale for their retirement.

OTHER NEWS

NEW ERO Registration Team Prepares for Launch of Joint Registration Organization Project

As part of the Entity Registration Program, the ERO Registration team would like to inform registered entities of a new project to develop an application for automating the Joint Registration Organization (JRO) process. This application, which will be accessed from the NERC ERO Portal, will provide registered entities, Regional Entities, and NERC Registration with the ability to systematically submit and manage JRO requests. A consolidated portal is important for maintaining consistency, reducing burden, and improving registration services.

The ERO Registration team will send subsequent communications that will request feedback from registered entities who currently participate in a JRO. The team will seek input through early February from all JRO registered entities on the design. There are plans to assemble a small focus group to provide end-user feedback during the development of the tool. This focus group will start participating in early February. Later in the project, the ERO Registration team will seek JRO registered entities to participate in testing the software functionality before releasing the tool, which is tentatively scheduled for fourth quarter 2018.

NERC and the Regional Entities will be coordinating the information gathering efforts on the project and will send additional progress updates to the JRO Registered Entities as necessary.

NEW 2017 Operating Committee Special Election Results Posted

The Operating Committee (OC) opened nominations for four vacant positions from December 22, 2017 through January 11, 2018. The <u>election</u> results have been posted on the <u>Operating Committee – 2017 Special Election</u> page of the NERC website.



STANDARDS SUBJECT TO FUTURE ENFORCEMENT

The following standards are subject to future enforcement. Please refer to the <u>U.S. Effective Dates page</u> for more detail:

U.S. Effective Date	Standard(s)
April 1, 2018	IRO-018-1(i) – Reliability Coordinator Real-time Reliability Monitoring and Analysis Capabilities
	TOP-010-1(i) – Real-time Reliability Monitoring and Analysis Capabilities
July 1, 2018	<u>CIP-009-6 – Cyber Security — Recovery Plans for BES Cyber Systems (Requirement 2.3);</u>
	<u>CIP-010-2 – Cyber Security — Configuration Change Management and Vulnerability Assessments (Requirements</u>
	<u>3.2, 3.2.1, 3.2.2);</u>
	MOD-026-1 – Verification of Models and Data for Generator Excitation Control System or Plant Volt/Var Control
	Functions (Requirements 2, 2.1–2.1.6);
	MOD-027-1 – Verification of Models and Data for Turbine/Governor and Load Control or Active Power/Frequency
	Control Functions (Requirements 2, 2.1–2.1.5);
	TOP-001-4 – Transmission Operations
	TPL-007-1 – Transmission System Planned Performance for Geomagnetic Disturbance Events (Requirement 2)
September 1, 2018	CIP-003-6 – Cyber Security – Security Management Controls (Requirement 2, Att. 1, Sec. 2 and 3);
January 1, 2019	BAL-005-1 – Balancing Authority Control
	FAC-001-3 – Facility Interconnection Requirements
	TPL-007-1 – Transmission System Planned Performance for Geomagnetic Disturbance Events (Requirement 5)
January 1, 2020	PRC-026-1 – Relay Performance During Stable Power Swings (Requirements 2–4)
July 1, 2020	PRC-002-2 – Disturbance Monitoring and Reporting Requirements (50% compliance for Requirements 2–4, 6–11)
January 1, 2021	PRC-012-2 – Remedial Action Schemes
	TPL-007-1 – Transmission System Planned Performance for Geomagnetic Disturbance Events (Requirements 6,
	6.1–6.4)
January 1, 2022	TPL-007-1 – Transmission System Planned Performance for Geomagnetic Disturbance Events (Requirements 3,4,7)
July 1, 2022	PRC-002-2 – Disturbance Monitoring and Reporting Requirements (100% compliance for Requirements 2–4, 6–11)



VAR-501-WECC-3 – Power System Stabilizer (Requirement 3 has an effective date of July 1, 2022 for units placed
in service prior to final regulatory approval.)

BOARD OF TRUSTEES AND FERC ACTION

NEW FERC Open Meeting Action

FERC issued a <u>notice of proposed rulemaking (NOPR)</u> proposing to approve new and modified Reliability Standards to address supply chain risk management. Proposed new Reliability Standard CIP-013-1 (Cyber Security – Supply Chain Risk Management) and the proposed modifications to Reliability Standards CIP-005-6 (Cyber Security – Electronic Security Perimeter(s)) and CIP-010-3 (Cyber Security – Configuration Change Management and Vulnerability Assessment) are intended to augment current Critical Infrastructure Protection standards to mitigate cyber security risks associated with the supply chain for grid-related cyber systems.

In the NOPR, FERC proposes to direct NERC to modify the proposed standards to address supply chain risk management for Electronic Access Control and Monitoring Systems associated with medium- and high-impact BES Cyber Systems. FERC also proposes to direct NERC to evaluate the supply chain risks presented by Physical Access Control Systems and Protected Cyber Assets as part of a study already proposed by the NERC Board to evaluate the scope and effectiveness of the proposed standards.

FERC also issued Order No. 840 approving EOP-004-4 (Event Reporting), EOP-005-3 (System Restoration from Blackstart Resources), EOP-006-3 (System Restoration Coordination) and EOP-008-2 (Loss of Control Center Functionality). These Emergency Preparedness and Operations (EOP) Reliability Standards enhance the requirements for Emergency Operations, including the communication and coordination amongst reporting entities.

UPCOMING EVENTS

For information about other NERC events, such as meetings and conference calls for standard drafting teams, other standing committees, subcommittees, task forces, and working groups, please refer to the <u>NERC calendar</u>.

Workshops and Conferences

• Seventh Annual Human Performance Conference – March 27–29, 2018, Atlanta | Register for Conference and Workshops | Register for Hotel



Webinars

There are no webinars currently scheduled.

Standing Committee Meetings and Conference Calls

- NEW Corporate Governance and Human Resources Committee Conference Call Noon–1:00 p.m. Eastern, January 24, 2018 | Agenda Package
- Board of Trustees Committees, Member Representatives Committee, and Board of Trustee Meetings February 7–8, 2018, Ft.
 Lauderdale, FL | Register
- Operating Committee, Planning Committee, and Critical Infrastructure Protection Committee Meetings March 6–7, 2018, Jacksonville, FL | Register for OC | Register for PC | Register for CIPC | Register for Hotel

Standard Drafting Team Meetings and Conference Calls

The <u>Standards calendar</u> provides dial-in information for the in-person meetings below. The calendar also provides information about conference calls that drafting teams may hold in addition to in-person meetings.

- Project 2015-10 Single Points of Failure Standard Drafting Team Meeting January 23–25, 2018, St. Petersburg, FL | Register
- NEW Standards Efficiency Review Team Orientation Conference Call 1:00–2:00 p.m. Eastern, January 24, 2018 | Register
- NEW Standards Efficiency Review Team Orientation Conference Call 1:00–2:00 p.m. Eastern, January 26, 2018 | Register
- Project 2017-03 FAC-008-3 Periodic Review Team Meeting February 6–8, 2018, Alhambra, CA | Register
- Project 2016-02 Modifications to CIP Standards Drafting Team Meeting February 13–15, 2018, Orlando, FL | Register
- Project 2017-04 Periodic Review of Interchange Scheduling and Coordination Standards Team Meeting February 27–March 1, 2018,
 Dallas, TX | Register

ABOUT THE STANDARDS, COMPLIANCE, AND ENFORCEMENT BULLETIN

This weekly bulletin compiles a list of standards, compliance, and enforcement projects with actionable deadlines, as well as upcoming events, recently posted resources, other NERC documents posted for comment, and other relevant news and information. Please email Amy Desselle with feedback on this bulletin. The current bulletin and old bulletins are available under "Program News" on both the Standards home page and the Compliance & Enforcement home page.



If you would like to receive this bulletin or be added to the distribution list for a particular project, please contact <u>Sandy Shiflett</u>. For more information about any of the compliance news listed in the bulletin, please contact <u>Tiffany Whaley</u>.