

**ISO RTO Council
Standards Review Committee
Comments on
NERC 2022 Business Plan and Budget, Draft 1**

The ISO RTO Council’s (IRC) Standards Review Committee (SRC)¹ appreciates the opportunity to comment on the North American Electric Reliability Corporation’s (NERC) 2022 Business Plan & Budget (BP&B), Draft 1.

The SRC is very supportive of NERC’s 2022 budgetary emphasis on priority risks including Bulk Power System (BPS) and cyber security, fuel and energy assurance, and weatherization as these areas are of paramount importance to the IRC members. During the past year, extreme weather events impacting the electric grid and cybersecurity breaches in the gas pipeline industry highlight the need for NERC’s proposed budgetary increases.

Since a large portion of NERC’s 2022 budget increase is in the Electric Information Sharing and Analysis Center (E-ISAC), we encourage NERC to publish the metrics in Attachment 1 of the 2020 E-ISAC Long-Term Strategic Plan shown below.² The SRC suggests that these metrics be publicly posted at least annually.

Attachment 1

| 2020 Performance Metrics | | |
|---|--|---|
| Engagement | | |
| Percent increase in prospective member organizations engaged | Percent increase in diversity of types of member organizations participating in Industry Engagement Program and E-ISAC led workshops | Percent increase in cross-sector participation in GridEx |
| Percent increase in prospective member organizations that sign up to use the E-ISAC portal. | Percent increase in Canadian member organizations | Percent increase in state government participation in GridEx |
| Frequency of member user interactions by channel | Canadian Electricity Association support of 2021 budget | Quality and usefulness of CRM tool and data: actual results compared to business case assumptions |

¹ The IRC SRC comprises the California Independent System Operator Corporation (“CAISO”), the Electric Reliability Council of Texas, Inc. (“ERCOT”), the Independent Electricity System Operator (“IESO”), ISO New England Inc. (“ISO-NE”), the Midcontinent Independent System Operator, Inc. (“MISO”), the New York Independent System Operator, Inc. (“NYISO”), PJM Interconnection, L.L.C. (“PJM”), and the Southwest Power Pool, Inc. (“SPP”). ERCOT and PJM are not joining the comments. Individual IRC members may also file separate comments.

² 2020 E-ISAC Long-Term Strategic Plan, October 15, 2020 <https://www.eisac.com/resources/documents>

| | | |
|--|---|--|
| Elapsed time since last member interaction (e.g., share or contact) | Percent increase in GridEx participation | |
| Analysis | | |
| Percent increase of content enriched by E-ISAC analysts | Percent increase in joint analytical products with partners | E-ISAC Data Platform project implementation variance from plan |
| Unclassified Threat Workshop content survey results (relevant, timely, unique, actionable) | | |
| Information Sharing | | |
| Member Portal Sharing: Percent increase in number of portal posts by member organizations | Member Information Sharing: Volume of member organization information sharing within predefined peer groups | Implementation of Portal Enhancements Per Approved Project Plan |
| Total Information Shares: Percent increase in number of information shares by source, channel, and event type | Member Information Sharing: Percent increase in quality and unique value-add information received from member organizations | Security Watch Operations Coverage: <ul style="list-style-type: none"> • On Duty: Core Hours Head Count • On Call: Off Hours Head Count • On Duty: Off Hours Head Count |
| Partner Information Sharing: Percent increase in volume of information shares received from partner organizations Percent increase in quality of information shares received from partner organizations | Percent Increase in Targeted Feedback from Members and Partners | Security Watch Operations Sharing: Indicators of compromise (IOC) loaded into external sharing platform |
| Staffing and Attrition | | |
| Annual employee attrition rate | Total staff and period over period net change | |

Transparency of these metrics will allow stakeholders to understand and analyze trends as E-ISAC is relied upon by the industry to monitor, analyze and communicate threats to the reliability and security of the BPS. The E-ISAC must function efficiently and effectively to ensure it is able to provide the most relevant and timely actions in response to BPS threats and vulnerabilities.

Conclusion

The SRC appreciates the opportunity to provide comments on NERC’s 2022 BP&B, and asks NERC to consider the comments offered as the BP&B is finalized.