# UNITED STATES OF AMERICA BEFORE THE FEDERAL ENERGY REGULATORY COMMISSION

North American Electric Reliability	Docket Nos. RM05-17-000
Corporation	) RM05-25-000
	RM06-16-000

# NORTH AMERICAN ELECTRIC RELIABILITY CORPORATION INFORMATIONAL FILING OF RELIABILITY STANDARDS DEVELOPMENT PLAN 2023–2025

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# TABLE OF CONTENTS

I.	NO	TICES AND COMMUNICATIONS	2
II.	BAG	CKGROUND	2
		3 DEVELOPMENT PLAN	
A		Summary of the 2023 Development Plan	
		2022 Progress Report	
		Prioritization of 2023 Projects	
		NCLUSION	
•	- 01		

**Attachment A** Reliability Standards Development Plan: 2023–2025

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# NORTH AMERICAN ELECTRIC RELIABILITY CORPORATION INFORMATIONAL FILING OF RELIABILITY STANDARDS DEVELOPMENT PLAN 2023–2025

The North American Electric Reliability Corporation ("NERC") hereby submits its 2023–2025 Reliability Standards Development Plan ("2023 Development Plan") in accordance with Section 310 of the NERC Rules of Procedure. The 2023 Development Plan, included herein as **Attachment A**, provides a status update on active development projects, a forecast of future work to be undertaken by NERC and its stakeholders throughout the upcoming year, and an analysis comparing completed projects and development accomplishments with the prior year's Reliability Standards Development Plan. The NERC Board of Trustees ("NERC Board") approved the 2023 Development Plan on November 16, 2022. NERC submits this filing and the attached 2023 Development Plan for informational purposes only.

of-Procedure.aspx.

Section 310 of NERC's Rules of Procedure requires NERC to develop and provide an annual Reliability Standards Development Plan for development of Reliability Standards to the applicable governmental authorities.

Under that section, NERC is also required to consider comments and priorities of the applicable governmental authorities in any updates made to the plan, and the plan should compare current accomplishments with the prior year's plan. See NERC's Rules of Procedure, accessible online at: https://www.nerc.com/AboutNERC/Pages/Rules-

# I. <u>NOTICES AND COMMUNICATIONS</u>

Notices and communications regarding this filing may be addressed to the following:

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# II. <u>BACKGROUND</u>

Pursuant to Section 310 of the NERC Rules of Procedure, NERC submitted an initial version of a plan for Reliability Standards development, titled the *Reliability Standards Development Plan: 2007–2009*, to the Federal Energy Regulatory Commission ("FERC" or "Commission") in 2006. NERC has since updated the plan annually, and the 2023–2025 version of the plan is presented in this filing. Consistent with previous versions, the 2023 Development Plan is filed for informational purposes and no specific Commission action is requested at this time.

The 2023 Development Plan is intended to:

- 1. Serve as a management tool to guide and coordinate the development of Reliability Standards and provide benchmarks for assessing progress;
- 2. Serve as a communication tool for coordinating standards development work with applicable governmental agencies in the United States and Canada and for engaging stakeholders in Reliability Standards development activities; and
- 3. Provide a basis for developing annual plans and budgets for the NERC Reliability Standards Program.

As with each prior year's plan, NERC obtained stakeholder input on the 2023 Development Plan. As detailed in Section III, NERC submits this filing to summarize the 2023 Development Plan and inform the Commission and other interested parties of projects noted in the 2022 Development Plan that will continue into 2023.

# III. 2023 DEVELOPMENT PLAN

# A. Summary of the 2023 Development Plan

The 2023 Development Plan identifies the current plans and priorities for development and modification of NERC Reliability Standards in the immediate three-year time horizon. NERC anticipates that the Reliability Standards development work outlined in the 2023 Development Plan will be dynamic and will be updated periodically as projects are completed or as new needs are identified and projects are considered. <sup>2</sup> NERC also recognizes Reliability Standards development in 2023 may require flexibility in planning to ensure that activities are given appropriate resources and priority.

The 2023 Development Plan builds upon the work of previous years, while adding new projects intended to address new and emerging reliability risks and issues. Projects to develop new or revised Reliability Standards may be initiated in response to Commission directives or to address new or emerging risks. Periodic Reviews will be aligned with the strategic consideration of reviewing standard families that are interrelated. The Standards Grading efforts for 2022 has been completed and results are included.

To identify reliability risks, NERC will continue to seek input and recommendations from the Reliability Issues Steering Committee ("RISC") and employ feedback from sources such as the Compliance Monitoring and Enforcement Program, RISC profiles, Events Analysis, Compliance violation statistics, published "Lessons Learned," and any feedback from Regional Entities. Input into standards will also continue to be coordinated with the North American Energy Standards Board as appropriate. In assessing feedback to create new or revised standards, NERC

3

See, e.g., FERC's Order directing a work plan for Registration of Inverter-based Resources, 181 FERC ¶ 61,124 (Nov. 17, 2022) (Docket No. RD22-4-000); and Notice of Proposed Rulemaking regarding Reliability Standards to Address Inverter-Based Resources, 181 FERC ¶ 61,125 (Nov. 17, 2022) (Docket No. RM22-12-000).

will focus on risk, reliability or security data, and enforcement information to determine whether a standard revision is the best tool to initially address the reliability risk.

# B. 2022 Progress Report

The 2022 Development Plan identified standard development projects that would be initiated in 2022 or continue from 2021. The projects and their current status are noted below. Additional project information is available on the NERC website on the Standards web page.<sup>3</sup>

# 1. <u>Standards Projects Completed in 2022</u>

Several projects (or portions of projects) identified in the 2022 Development Plan were completed in 2022. These projects, along with when the associated standard(s) were adopted by the NERC Board of Trustees, are identified below:

- Project 2020-03 Supply Chain Low Impact Revisions (adopted by the Board November 2022)
- Project 2020-05 Modifications to FAC-001-3 and FAC-002-2 (adopted by the Board May 2022)
- Project 2021-07 Extreme Cold Weather Grid Operations, Preparedness, and Coordination (Phase 1) (adopted by the Board October 2022)

# 2. Projects Continuing in 2023

The following standard development projects identified in the 2022 Development Plan will continue into 2023:

- Project 2016-02 Modifications to CIP Standards
- Project 2017-01 Modifications to BAL-003-1.1 (phase 2)
- Project 2019-04 Modifications to PRC-005-6
- Project 2020-02 Modifications to PRC-024 (Generator Ride-through)
- Project 2020-04 Modifications to CIP-012

NERC Reliability Standards, https://www.nerc.com/pa/Stand/Pages/default.aspx.

- Project 2020-06 Verifications of Models and Data for Generators
- Project 2021-01 Modifications to MOD-025 and PRC-019
- Project 2021-02 Modifications to VAR-002
- Project 2021-03 CIP-002 Transmission Owner Control Centers
- Project 2021-04 Modifications to PRC-002-2
- Project 2021-05 Modifications to PRC-023
- Project 2021-06 Modifications to IRO-010 and TOP-003
- Project 2021-07 Extreme Cold Weather Grid Operations, Preparedness, and Coordination (phase 2)
- Project 2021-08 Modifications to FAC-008

Additionally, the following projects, which began in 2022, will continue into 2023:

- Project 2022-01 Reporting ACE Definition and Associated Terms
- Project 2022-02 Modifications to TPL-001-5.1 and MOD-032-1
- Project 2022-03 Energy Assurance with Energy-Constrained Resources
- Project 2022-04 EMT Modeling
- Project 2022-05 Modification to CIP-008

Each of these projects is identified and prioritized in the 2023 Development Plan, as described in the following section. No Reliability Standards are due for periodic review in 2023.

# 3. Standards Efficiency Review Transition

In 2018, NERC began using both internal ERO Enterprise resources and industry resources to evaluate candidates for potential Reliability Standard retirements. NERC solicited industry participants to evaluate possible candidate requirements that may no longer be necessary to support reliability or address current risks to the Bulk-Power System. Through open and transparent industry participation, the Standards Efficiency Review ("SER") teams submitted a Standards

Authorization Request ("SAR") to the Standards Committee in order to implement recommended changes to the body of Reliability Standards. The SAR was accepted at the August 2018 Standards Committee meeting, and the effort retired numerous standards and requirements in 2019.

The Standards Efficiency Review Report and Transition Plan<sup>4</sup> outlines the Phase 1 and Phase 2 work, the additional recommendations, and closes out the SER. The SER recommendations are being implemented, which include Project 2021-06 Modifications to IRO-010 and TOP-003 regarding operational data exchange.

# 4. Inverter-based Resource Performance Task Force

As a result of the growth in use of inverters as part of the Bulk-Power System, the NERC Inverter-based Resource Performance Task Force ("IRPTF") undertook an effort to perform a comprehensive review of all NERC Reliability Standards to determine if there were any potential gaps or improvements. The IRPTF identified several issues as part of this effort and documented its findings and recommendations in the IRPTF Review of NERC Reliability Standards White Paper, <sup>5</sup> which was approved in March 2020 by the Operating Committee and the Planning Committee (now part of the Reliability and Security Technical Committee). This assessment generated a number of projects listed in the RSDP.

### C. Prioritization of 2023 Projects

Each new or continuing Reliability Standard Project identified in the 2023 Development Plan has been assigned a priority of either high, medium, or low. These rankings are in addition to priority assignments made in previous plans for ongoing projects, and the assignments are based

NERC, "Standards Efficiency Review Report and Transition Plan" (May 2021), https://www.nerc.com/pa/Stand/Standards%20Efficiency%20Review%20DL/SER\_Project\_Final\_Recommendation\_and\_Transition\_05042021.pdf.

NERC IRPTF, "IRPTF Review of NERC Reliability Standards Whitepaper" (Mar. 2020), https://www.nerc.com/pa/Stand/Project202104ModificationstoPRC0022DL/Review\_of\_NERC\_Reliability\_Standards White Paper 062021.pdf.

on the following criteria: (i) outstanding regulatory directives with filing deadlines (high priority); (ii) RISC category rankings of high impact with consideration of probability of occurrence (high or medium priority); (iii) potential reliability risks identified through feedback mechanisms (high, medium, or low priority, based on the risk); (iv) outstanding regulatory directives without regulatory deadlines or regulatory considerations (high or medium priority); (v) outstanding requirements that are known candidates for retirement (medium or low priority); and (vi) any known adverse content and quality assessment (likely low priority). The new and continuing projects identified in the 2023 Development Plan and their assigned priority category are provided below.

# **High Priority**

- Project 2016-02 Modifications to CIP Standards
- Project 2020-04 Modifications to CIP-012
- Project 2021-03 CIP-002 Transmission Owner Control Centers
- Project 2021-07 Extreme Cold Weather Grid Operations, Preparedness, and Coordination (Phase 2)
- Project 2022-02 Modifications to TPL-001-5.1 and MOD-032-1
- Project 2022-03 Energy Assurance with Energy–Constrained Resources

# **Medium Priority**

- Project 2017-01 Modifications to BAL-003-1.1 (phase 2)
- Project 2020-02 Transmission-connected Dynamic Reactive Resources
- Project 2020-06 Verifications of Models and Data for Generators
- Project 2022-04 EMT Modeling

# **Low Priority**

- Project 2019-04 Modifications to PRC-005-6
- Project 2021-01 Modifications to MOD-025 and PRC-019

- Project 2021-02 Modifications to VAR-002
- Project 2021-04 Modifications to PRC-002-2
- Project 2021-05 Modifications to PRC-023
- Project 2021-06 Modifications to IRO-010 and TOP-003
- Project 2021-08 Modifications to FAC-008
- Project 2022-01 Reporting ACE Definition and Associated Terms

Other projects may be initiated in 2023 based on new Standard Authorization Requests, including those being developed by the Reliability and Security Technical Committee, emerging risks to the Bulk-Power System, or new regulatory directives.

[continued below]

IV. **CONCLUSION** 

As discussed above, the 2023 Development Plan was developed in accordance with Section

310 of the NERC Rules of Procedure and identifies the current plans and priorities for development

and modification of NERC Reliability Standards in the immediate three-year time horizon. NERC

submits this filing and the attached 2023 Development Plan for informational purposes only.

Respectfully submitted,

/s/ Lauren A. Perotti

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Date: November 30, 2022

9

# **CERTIFICATE OF SERVICE**

I hereby certify that I have served a copy of the foregoing document upon all parties listed on the official service list compiled by the Secretary in this proceeding. Dated at Washington, D.C. this 30<sup>th</sup> day of November, 2022.

/s/ Lauren A. Perotti

Lauren A. Perotti Counsel for the North American Electric Reliability Corporation

# ATTACHMENT A RELIABILITY STANDARDS DEVELOPMENT PLAN 2023–2025



# Reliability Standards Development Plan

2023-2025

September 21, 2022

# RELIABILITY | RESILIENCE | SECURITY









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# **Table of Contents**

Background	iii
Executive Summary	
Progress Report	1
FERC Directives	
Continuing Projects	1
2023 Projects	3
High Priority	3
Medium Priority	3
Low Priority	4
Other Projects Continuing into 2023	
Standards Grading Metrics	6
Attachment 1: Final Grades for Standards Considered in 2022	7

# **Background**

Pursuant to Section 310 of the NERC Rules of Procedure, NERC is required to develop and provide to applicable governmental authorities an annual Reliability Standards Development Plan (RSDP) for Reliability Standards development. Each annual RSDP must include a progress report comparing results achieved to the prior year's RSDP. NERC is required to consider the comments and priorities of the applicable governmental authorities in developing and updating the annual RSDP. NERC also provides the RSDP to the NERC Standards Committee (SC) for review and posts the RSDP for industry comment.

As described herein, this RSDP for 2023-2025 builds upon the goals of the previous RSDPs.

# **Executive Summary**

The 2023-2025 RSDP provides insight into standards development activities anticipated at the time of publication so that stakeholders may make available resources needed to accomplish the standards development objectives. Additional activities such as Requests for Interpretation and Regional Variance development may impact the plan and are included at this time. In order to help the industry understand resource requirements for each project, the RSDP now shows time frames and anticipated resources for each project under development.

This RSDP contemplates that the work of the Reliability and Security Technical Committee (RSTC) and working groups thereunder may result in more Standard Authorization Requests (SARs) and subsequent standards projects. It is also important to note that projects may be generated through the use of the Electric Reliability Organization risk framework.

Periodic Reviews and initiatives, such as the final recommendations of the Standards Efficiency Review (SER) project, also enable NERC to identify requirements that do little to promote reliability and should therefore be retired. Periodic Reviews will occur at a measured pace compared to the level of activity and pace of standards development during recent years. Additionally, Periodic Reviews will be aligned with the strategic consideration of reviewing standard families that are interrelated.<sup>1</sup> The Standards Grading effort for 2022 has been completed and results are included.

While most of the work in the next three years will focus on new SARs, Periodic Reviews, SER implementation, and Standards Grading, there may be new or emerging risks identified that could generate new standards development projects. NERC will continue to seek input and recommendations from the Reliability Issues Steering Committee (RISC) with regard to emerging or potential risks to Bulk Electric System (BES) reliability that may require revisions to existing standards or new standards development.

To help determine the impact of potential risk to BES reliability, NERC will use a variety of feedback mechanisms, including but not limited to, the Compliance Monitoring and Enforcement Program, RISC profiles, Events Analysis, and Compliance violation statistics, as well as any published "Lessons Learned." The Regional Entities also have feedback mechanisms in place to solicit comments from industry and to help identify approaches to meet concerns and provide input to the standards. Input into standards will also continue to be coordinated with the North American Energy Standards Board as appropriate. In assessing feedback to create new or revised standards, NERC will focus on risk, reliability or security data, and enforcement information to determine whether a standard revision is the best tool to initially address the reliability risk.

<sup>&</sup>lt;sup>1</sup> The Periodic Review Standing Review Team grades the standards prior to conducting Periodic Reviews. The team includes representatives from NERC, the Regional Entities, and RSTC. If the standard is revised through the standard development process in response to a Periodic Review recommendation(s), the Periodic Review Standing Review Team will re-grade the standard with the revised language.

# **Progress Report**

Pursuant to Section 310 of the NERC Rules of Procedure, NERC offers the following progress report on Reliability Standards development.

# **FERC Directives**

As of June 30, 2022, there are two<sup>2</sup> outstanding directives being resolved through the standards development process. The status of the Standards directives are reported quarterly to the NERC Board of Trustees (Board).

# **Continuing Projects**

All of the other projects from the previous RSDP are complete, or are expected to be complete this year, except the following, which will continue into 2023:

- 1. Project 2016-02 Modifications to CIP Standards
- 2. Project 2017-01 Modifications to BAL-003-1.1 (phase 2)
- 3. Project 2019-04 Modifications to PRC-005-6
- 4. Project 2020-02 Modifications to PRC-024 (Generator Ride-through)
- 5. Project 2020-04 Modifications to CIP-012
- 6. Project 2020-06 Verifications of Models and Data for Generators
- 7. Project 2021-01 Modifications to MOD-025 and PRC-019
- 8. Project 2021-02 Modifications to VAR-002
- 9. Project 2021-03 CIP-002 Transmission Owner Control Centers
- 10. Project 2021-04 Modifications to PRC-002-2
- 11. Project 2021-05 Modifications to PRC-023
- 12. Project 2021-06 Modifications to IRO-010 and TOP-003
- 13. Project 2021-07 Extreme Cold Weather Grid Operations, Preparedness, and Coordination (Phase 2)
- 14. Project 2021-08 Modifications to FAC-008
- 15. Project 2022-01 Reporting ACE Definition and Associated Terms
- 16. Project 2022-02 Modifications to TPL-001-5.1 and MOD-032-1
- 17. Project 2022-03 Energy Assurance with Energy—Constrained Resources
- 18. Project 2022-04 EMT Modeling
- 19. Project 2022-05 Modification to CIP-008 Reporting Threshold

Additional project information is available on the NERC website on the Standards web page.<sup>3</sup>

The following projects are currently modifying standards to address directives: 2020-04 Modifications to CIP-012 (requirement for protections regarding the availability of communication links and data communicated between bulk electric system Control Centers). The second directive is a requirement to submit project schedules for one ongoing CIP project.

<sup>&</sup>lt;sup>3</sup> As of the date of publication, the subject web page resides at <a href="http://www.nerc.com/pa/Stand/Pages/default.aspx">http://www.nerc.com/pa/Stand/Pages/default.aspx</a>.

The following projects have been, or are planned to be, completed in 2022 (actual and anticipated Board adoption dates are noted):

- 1. Project 2020-03 Supply Chain Low Impact Revisions (anticipated Board adoption November 2022)
- 2. Project 2020-05 Modifications to FAC-001-3 and FAC-002-2 (adopted by the Board May 2022)
- 3. Project 2021-07 Extreme Cold Weather Grid Operations, Preparedness, and Coordination (Phase 1) (anticipated Board adoption October 2022)

# **2023 Projects**

# **Projects Continuing into 2023**

In determining high, medium, or low priority designations for projects as listed in this RSDP, the following factors were taken into consideration:

- Outstanding regulatory directives with filing deadlines (High Priority)
- RISC category rankings of high impact with consideration of probability of occurrence (High or Medium Priority)
- Potential reliability risks from stakeholders provided through feedback mechanisms (High, Medium, or Low Priority, based on the risk)
- Outstanding regulatory directives without regulatory deadlines or "soft directives" such as considerations (High or Medium Priority)
- Outstanding requirements that are known candidates for retirement (Medium or Low Priority)
- Any known adverse content and quality assessments (likely Low Priority, as any reliability gaps identified have already been addressed)

# **High Priority**

- Project 2016-02 <u>Modifications to CIP Standards</u> (drafting estimated to be completed by February 2023 requiring approximately 9 industry subject matter experts for approximately 120 work hours each for the remaining part of this project)
- Project 2020-04 Modifications to CIP-012 (drafting estimated to be completed by February 2023 requiring approximately 8 industry subject matter experts for approximately 100 work hours each for the remaining part of this project)
- Project 2021-07 Extreme Cold Weather Grid Operations, Preparedness, and Coordination (drafting estimated
  to be completed in two phases over 2022-2023; first phase expected to be completed by September 2022
  requiring 15 subject matter experts for approximately 175 work hours each for Phase 1 and Phase 2 of this
  project)
- Project 2021-03 <u>CIP-002 Transmission Owner Control Centers</u> (drafting estimated to be completed by August 2023 requiring approximately 10 subject matter experts for approximately 40 work hours each for this project). Three additional SARs pertaining to CIP-002 are assigned to this project. Additional subject matter experts are being solicited to address these SARs (drafting estimated to be completed by November 2023 requiring approximately 10 subject matter experts for approximately 40 work hours each for this project)
- Project 2022-02 Modifications to TPL-001-5.1 and MOD-032-1 (drafting estimated to be completed by August 2023 requiring approximately 10 subject matter experts for approximately 40 work hours each for this project)
- Project 2022-03 Energy Assurance with Energy—Constrained Resources (drafting estimated to be completed by February 2023 requiring approximately 12-15 industry subject matter experts for approximately 120 work hours each for the remaining part of this project)

# **Medium Priority**

 Project 2017-01 Modifications to BAL-003-1.1 (phase 2) (drafting estimated to be completed by February 2023 requiring approximately 10 subject matter experts for approximately 40 work hours each for this project)

- Project 2020-02 Modifications to PRC-024 (Generator Ride-through) (drafting estimated to be completed by November 2023 requiring approximately 9 industry subject matter experts for approximately 120 work hours each for the remaining part of this project)
- Project 2020-06 <u>Verifications of Models and Data for Generators</u> (drafting estimated to be completed by February 2023 requiring approximately 12 subject matter experts for approximately 40 work hours each for this project)
- Project 2022-04 <u>EMT Modeling</u> (drafting estimated to be completed by February 2024 requiring approximately 12 subject matter experts for approximately 40 work hours each for this project)
- Project 2022-05 <u>Modifications to CIP-008 Reporting Threshold</u> (drafting estimated to be completed by November 2023 requiring approximately 8 industry subject matter experts for approximately 100 work hours each for the remaining part of this project)

### **Low Priority**

- Project 2019-04 Modifications to PRC-005-6 (drafting estimated to be completed by August 2023 requiring approximately 13 subject matter experts for approximately 40 work hours each for this project)
- Project 2021-01 Modifications to MOD-025 and PRC-019 (drafting estimated to be completed by May 2023 requiring approximately 12 subject matter experts for approximately 40 work hours each for this project)
- Project 2021-02 Modifications to VAR-002 (drafting estimated to be completed by May 2023 requiring approximately 13 subject matter experts for approximately 40 work hours each for this project)
- Project 2021-04 Modifications to PRC-002-2 (drafting estimated to be completed by May 2023 requiring approximately 10 subject matter experts for approximately 40 work hours each for this project)
- Project 2021-05 <u>Modifications to PRC-023</u> (drafting estimated to be completed by May 2023 requiring approximately 10 subject matter experts for approximately 40 work hours each for this project)
- Project 2021-06 <u>Modifications to IRO-010 and TOP-003</u> (drafting estimated to be completed by November 2023 requiring approximately 10 subject matter experts for approximately 40 work hours each for this project)
- Project 2021-08 <u>Modifications to FAC-008</u> (drafting estimated to be completed by August 2023 requiring approximately 10 subject matter experts for approximately 40 work hours each for this project)
- Project 2022-01 Reporting ACE Definition and Associated Terms (drafting estimated to be completed by August 2023 requiring approximately 10 subject matter experts for approximately 40 work hours each for this project)

# **Other Projects Continuing into 2023**

# **NERC Reliability Standards Efficiency Review Transition**

In 2018, NERC began using both internal ERO Enterprise resources and industry resources to evaluate candidates for potential Reliability Standard retirements. NERC solicited industry participants to evaluate possible candidate requirements that may no longer be necessary to support reliability or address current risks to the Bulk Power System (BPS). Through open and transparent industry participation, the SER teams submitted a SAR to the SC in order to implement recommended changes to the body of Reliability Standards. The SAR was accepted at the August 2018 SC meeting, and the effort retired numerous standards and requirements in 2019.

The <u>Standards Efficiency Review Report and Transition Plan</u> outlines the Phase 1 and Phase 2 work, the additional recommendations, and closes out the SER. The SER recommendations are being implemented, which include Project 2021-06 Modifications to IRO-010 and TOP-003 regarding operational data exchange.

# **Standards Development Projects Overview**

The NERC RSTC subcommittees, working groups, and task forces conduct work plan activities as assigned. Known and emerging risks are reviewed and assessed and may result in a SAR being submitted to initiate a standards development project. Also, as industry works to operate a reliable and secure grid, a SAR may be submitted to address risks.

As a result of the growth in use of inverters as part of the bulk power system, the NERC Inverter-based Resource (IBR) Performance Task Force (IRPTF) undertook an effort to perform a comprehensive review of all NERC Reliability Standards to determine if there were any potential gaps or improvements. The IRPTF identified several issues as part of this effort and documented its findings and recommendations in the "IRPTF Review of NERC Reliability Standards White Paper," which was approved in March 2020 by the Operating Committee and the Planning Committee (now part of the Reliability and Security Technical Committee (RSTC)). This assessment generated a number of projects listed in the RSDP.

The ERO's focus on cyber security is also at the forefront of addressing reliability risks. Standard development projects addressing virtualization and protecting cyber assets and communication links are a result of continued actions to keep the grid secure.

# **Other Projects Commencing**

Currently, no Reliability Standards meet the criteria for periodic review in 2023. SARs, emerging risks to the BPS, and FERC regulatory directives that may occur subsequent to publishing this RSDP may prompt additional projects through 2023.

# **Standards Grading Metrics**

The NERC SC endorsed the initial grading system for standards as a metric on March 9, 2016. The grading activity was directed by the NERC Board and was conducted by the Periodic Review Standing Review Team (PRSRT) as set forth in the Periodic Review process.<sup>4</sup> The PRSRT is comprised of the following:

- SRT Chair: SC Chair or (or SC Chair delegate)
- Representation from the Reliability and Security Technical Committee (RSTC)
- Representation from the Regional Entities
- NERC staff

The grading metrics include possible scores of 0-4 for content and 0-13 for quality. The set of standards chosen each year for grading, according to the criteria in the above section, will be graded to prioritize, and be a factor in determining the sequence they should enter into the Periodic Review process. At least one industry comment period will take place to allow industry to comment on the grading performed by the PRSRT. The grades, based on the PRSRT and any industry input, will be finalized, appended to the RSDP, and used to complete the prioritization each year. Additionally, input from other standards initiatives such as the Standards Efficiency Review (now completed), are being considered and coordinated with the Standards Grading activities.

<sup>&</sup>lt;sup>4</sup> The process is detailed in the Periodic Review template, which is available at: <a href="https://www.nerc.com/pa/Stand/Resources/Documents/Periodic%20Review%20Template%20Feb%202016.pdf">https://www.nerc.com/pa/Stand/Resources/Documents/Periodic%20Review%20Template%20Feb%202016.pdf</a>.

# **Attachment 1: Final Grades for Standards Considered in 2022**

The PRSRT was tasked with using metrics from the 2013 Independent Experts Review Panel to assign numeric grades to instruct future Periodic Review teams.

While the PRSRT's final standards grades are important data points for the Periodic Reviews to consider, they are intended as one of many inputs to facilitate discussion during the reviews. Detailed analysis and background information on the Standards Grading process and PRSRT recommendations for periodic review project prioritization based on 2022 grades are posted on the <u>project page</u>.

2022 Standards Grades				
Standard	Requirement	Content Average	Quality Average	
PER-003-2	R1.	4.00	12.67	
PER-003-2	R2.	4.00	12.33	
PER-003-2	R3.	4.00	12.67	
PER-005-2	R1.	4.00	13.00	
PER-005-2	R2.	4.00	13.00	
PER-005-2	R3.	4.00	12.67	
PER-005-2	R4.	4.00	13.00	
PER-005-2	R5.	3.67	13.00	
PER-005-2	R6.	3.67	13.00	
PER-006-1	R1.	3.67	13.00	
TPL-007-4	R1.	4.00	13.00	
TPL-007-4	R2.	4.00	13.00	
TPL-007-4	R3.	4.00	13.00	
TPL-007-4	R4.	3.33	10.67	
TPL-007-4	R5.	4.00	12.67	
TPL-007-4	R6.	3.67	12.00	
TPL-007-4	R7.	4.00	12.00	
TPL-007-4	R8.	3.67	12.00	
TPL-007-4	R9.	4.00	12.67	
TPL-007-4	R10.	3.67	12.00	
TPL-007-4	R11.	4.00	12.00	
TPL-007-4	R12.	4.00	12.00	
TPL-007-4	R13.	4.00	12.67	