# UNITED STATES OF AMERICA BEFORE THE FEDERAL ENERGY REGULATORY COMMISSION

North American Electric Reliability	)	
Corporation	)	<b>Docket No. FA11-21-000</b>

# COMPLIANCE FILING OF THE NORTH AMERICAN ELECTRIC RELIABILITY CORPORATION

### I. <u>INTRODUCTION</u>

The North American Electric Reliability Corporation ("NERC")<sup>1</sup> submits this compliance filing in accordance with the Federal Energy Regulatory Commission's ("FERC" or "Commission") January 16, 2013 Settlement Order in Docket No. FA11-21-000 ("Settlement Order").<sup>2</sup> In the Settlement Order, the Commission approved a Settlement Agreement between the FERC Office of Enforcement ("OE") and NERC relating to OE's findings and recommendations arising out of its 2012 performance audit of NERC. Specifically, Section II.7(b)(i) of the Settlement Agreement requires that:

Within forty-five days of the end of each quarter, beginning with the quarter ending March 31, 2013, NERC will file with the Commission the unaudited report of the NERC budget-to-actual spending variances during the preceding quarter. This report will include information *regarding sources and uses* of operating and working capital reserves and will match or exceed the level of detail of the quarterly budget-to-actual variance report of NERC expenditures attached to the agenda of NERC Board of Trustees Finance and Audit Committee's October 2012 meeting.<sup>3</sup>

Attached hereto is the unaudited report of NERC's budget-to-actual variance information for the fourth quarter of 2021, in accordance with the Settlement Order. This variance information

NERC was certified by FERC as the electric reliability organization ("ERO") authorized by Section 215 of the Federal Power Act. FERC certified NERC as the ERO in its order issued July 20, 2006 in Docket No. RR06-1-000. Order Certifying North American Electric Reliability Corporation as the Electric Reliability Organization and Ordering Compliance Filing, 116 FERC ¶ 61,062 (2006).

<sup>&</sup>lt;sup>2</sup> See N. Am. Elec. Reliability Corp., Order Approving Settlement Agreement, 142 FERC ¶ 61,042 (Jan. 16, 2013) [hereinafter Settlement Order].

<sup>3</sup> *Id.* (emphasis added).

was posted on NERC's website on February 2, 2022 and was reviewed at the February 9, 2022 open meeting of the NERC Finance and Audit Committee.

# II. NOTICES AND COMMUNICATIONS

Notices and communications with respect to this filing may be addressed to the

# following:

Nina Jenkins-Johnston
Assistant General Counsel
North American Electric Reliability
Corporation
3353 Peachtree Road NE, Suite 600 – North
Tower
Atlanta, GA 30326
(404) 446-9650
nina.johnston@nerc.net

Stefan Bergere
Counsel
North American Electric Reliability
Corporation
1325 G St. NW, Suite 600
Washington, DC 20005
stefan.bergere@nerc.net

Andy Sharp
Vice President, Chief Financial Officer
North American Electric Reliability
Corporation
3353 Peachtree Road NE, Suite 600 – North
Tower
Atlanta, GA 30326
(404) 446-9732
andy.sharp@nerc.net

# III. <u>DISCUSSION OF SIGNIFICANT VARIANCES BETWEEN THE 2021 BUDGET AND PROJECTED YEAR-END 2021 RESULTS</u>

In the attached variance report, NERC outlines the following:

(a) compares actual (unaudited) financial results through December 31, 2021 to NERC's budgeted expenditures through December 31, 2021; and,

(b) provides additional discussion of significant variances by NERC department or program area and by major activity within departments and program areas. NERC treats "significant" variances as those that are \$500,000 or more.<sup>4</sup>

# A. 2021 Actual Year-End Results vs. 2021 Budget Variances of \$500,000 or More by Revenue and Expense Category

Two revenue and expense categories had a budget variance \$500,000 or more as of December 31, 2021:

- "Meetings and Travel" expenses were \$1,921,854 (87.3%) under budget at yearend because of reduced in-person meetings and travel due to the ongoing COVID-19 pandemic.
- "Net Financing Activity" expenses were \$942,473 (111.6%) under budget at yearend. The "Net Financing Activity" budget did not contemplate NERC receiving
  loan proceeds in 2021 and therefore debt service payments on the loan were under
  budget. On May 14, 2020, the NERC Board approved the financing strategy for
  the \$3,800,000 Electric Reliability Organization Secure Evidence Locker (ERO
  SEL) capital investment, which included a \$2,000,000 credit facility. On June 22,
  2020, the Commission issued a letter order approving NERC's expenditure of up
  to \$3,800,000 for development costs, of which a maximum of \$2,000,000 would be
  funded through debt financing. Due to the pandemic, the project could not be
  completed in 2020 and continued into 2021. As such, NERC borrowed
  approximately \$1,292,000 of the \$2,000,000 in 2020 and \$683,000 in late 2021 to

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In Section 7(b)(ii) of the Settlement Agreement, the Commission specifies that the threshold for its review and approval for expenditures from Operating Reserves is where any amount allocated from the unforeseen contingencies account of Operating Reserves plus any amount redirected from previously budgeted funds is, in the aggregate, \$500,000 or more for any one specific project or major activity in a program area.

finance the remaining costs, for a total of approximately \$1,975,000. Accordingly, debt principal payments in 2021 were lower than budgeted in the 2021 business plan and budget since only a portion of the financing occurred in 2020 with the remainder in late 2021. NERC underscores that in spite of the timing difference in receiving loan proceeds, the total borrowing for the ERO SEL project in 2020 and 2021 was \$25,000 less than the approved \$2,000,000 threshold for the ERO SEL capital investment.

# B. 2021 Actual Year-End Results vs. 2021 Budget Variances of \$500,000 or More by Department or Program Area

The following departments or program areas were over or under budget as of December 31, 2021 by \$500,000 or more:

- Compliance Assurance was \$596,412 (9.2%) under budget at year-end. This was largely because of lower personnel costs (e.g., lower FTEs), as well as lower meeting and travel expenses, partially offset by higher contractor costs.
- Event Analysis was \$596,569 (25.0%) under budget at year-end. This is primarily attributable to lower personnel expenses due to the transfer of an open FTE position to Situation Awareness and also because of lower travel expenses.
- E-ISAC was \$561,812 (4.4%) under budget at year-end. This was mostly because of lower personnel expenses due to the allocation of a partial FTE to support administrative department projects, and lower travel and meeting expenses.

- In light of the Commission's December 2, 2021 Order<sup>5</sup> directing NERC to submit an informational filing explaining expenditures and amounts to fund the Cyber Risk Information Sharing Program (CRISP) activities, NERC is highlighting the excess or unspent 2021 year funding found in either the newly created CRISP Operating Reserve or the CRISP Special Projects Reserve.
  - On November 17, 2021, an amendment to the CRISP master agreement was sent to the CRISP participants stipulating that any unspent funds in any particular year, starting with 2021, collected from the CRISP participants for their participation in CRISP will be directed to a new CRISP Operating Reserve exclusively for use on CRISP activities. The amendment details how the Operating Reserve can be spent and the participants' approval process for such expenditures. The amendment has since been executed by all CRISP participants. This treatment of excess current year funding, totaling \$1,419,796 received from CRISP participants, above actual expenses is being placed in the CRISP Operating Reserve. This is a departure from prior practice, which called for the return of unspent money to the participants in the following budget year. Out of this \$1,419,796, \$600,000 was approved via the 2021 Business Plan & Budget to be spent in 2021; however, due to the pandemic and changing priorities undertaken during the year, it was not spent in 2021. By directing that the \$600,000 be applied to the CRISP Operating Reserve, the CRISP participants have approved use of such funds in 2022 on other CRISP activities.

N. Am. Reliability Corp., "Order Accepting 2020 True-Up Report with a Directive", 177 FERC ¶61,163 (2021).

In addition to the funds in the CRISP Operating Reserve, there is \$374,874 remaining in the CRISP Special Projects Reserve at the end of 2021. These funds were specifically for CRISP Operational Technology (OT) pilot projects and come from approximately \$1.0 million of funding collected in and unable to be spent in 2020 that was expected to be spent on the same projects in 2021. Due to other CRISP priorities and supply chain demands, the remainder was unable to be spent in 2021 and is anticipated to be spent on the same projects in 2022. In summary, the amounts originally budgeted to be spent on the CRISP OT pilot programs in 2020 that were deferred in 2020 and again 2021 due to the exigencies of the pandemic, are being spent in 2022 to complete the same CRISP OT pilot programs for which the expenditures were originally approved. There has been no redirection or reallocation of the budgeted but unspent 2020 or 2021 funds to any other project, activity, or program area from that in which the funds were originally budgeted. Indeed, placing the unspent 2020 and 2021 funds into a CRISP Special Projects Reserve served to highlight that these funds would be spent on these same CRISP activities and not on any other project, activity, or program, and set the funds aside for that purpose.

# IV. <u>CONCLUSION</u>

NERC respectfully requests that the Commission accept this filing as compliant with Section II.7(b)(i) of the Settlement Agreement and the Commission's Settlement Order in Docket No. FA11-21-000.

Respectfully submitted,

/s/ Nina Jenkins-Johnston

Nina Jenkins-Johnston Assistant General Counsel North American Electric Reliability Corporation 3353 Peachtree Road NE, Suite 600 – North Tower Atlanta, GA 30326 (404) 446-9650 nina.johnston@nerc.net

/s/ Stefan Bergere

Stefan Bergere Counsel North American Electric Reliability Corporation 1325 G St. NW, Suite 600 Washington, DC 20005 stefan.bergere@nerc.net

Counsel for North American Electric Reliability Corporation

Dated: February 14, 2022

# **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 14th day of February, 2022.

/s/ Nina Jenkins-Johnston

Nina Jenkins-Johnston Counsel for North American Electric Reliability Corporation

/s/ Stefan Bergere

Stefan Bergere Counsel North American Electric Reliability Corporation

# **ATTACHMENT**



Agenda Item 2a

# Summary of Unaudited Results For the Period Ending December 31, 2021

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# **Executive Summary**

# Year-to-Date Actual Results (\$ millions)

						Over
<u>FUNDING</u>	Α	ctual	В	udget	(	Under)
Revenues	\$	81.5	\$	81.2	\$	0.3
Funding from Reserves						
Assessment Stabilization Reserve		-		-		-
TOTAL FUNDING	\$	81.5	\$	81.2	\$	0.3
<b>EXPENDITURES</b>						
Expenses (excluding Depreciation)	\$	77.3	\$	79.3	\$	(2.0)
Fixed Asset Additions		2.9		2.8		0.1
Net Financing Activity		(0.1)		0.8		(0.9)
TOTAL EXPENDITURES	\$	80.1	\$	82.9	\$	(2.8)
RESERVE INCREASE (DECREASE)	\$	1.4	\$	(1.7)	\$	3.1

# **Summary**

Funding during 2021 is above budget mainly due to CRISP third-party funding being higher than budget as a result of unspent funds collected from the CRISP participants in 2021 being directed to a new CRISP Operating Reserve in 2021. This above budget funding is partially offset by lower than budgeted investment income. Expenditures (excluding depreciation) during the year are under budget primarily because of lower personnel, meeting, and travel expenses, as well as net financing activity, and are partially offset by higher office costs and professional services. The result is a reserve increase of \$3.1M higher than budget. This activity is explained in more detail in the remainder of this report.



# **Detailed Operating Results**

# **Variances by Revenue and Expense Category**

Total NERC (including CRISP)

					YTD	%
	•	YTD Actual	YTD Budget	O	ver (Under)	Over (Under)
TOTAL FUNDING	\$	81,546,997	\$ 81,155,550	\$	391,446	0.5%
EXPENDITURES						
Personnel	\$	47,837,127	\$ 48,189,435	\$	(352,308)	(0.7%)
Meetings and Travel		279,894	2,201,748		(1,921,854)	(87.3%)
Consultants and Contracts		12,585,611	12,691,813		(106,202)	(0.8%)
Office Rent		3,555,401	3,603,442		(48,041)	(1.3%)
Office Costs, Professional, and Misc.*		12,935,758	12,471,039		464,719	3.7%
Other Non-Operating		128,104	129,661		(1,557)	(1.2%)
Fixed Asset Additions*		2,903,196	2,751,500		151,696	5.5%
Net Financing Activity**		(97,872)	844,601		(942,473)	(111.6%)
TOTAL EXPENDITURES	\$	80,127,220	\$ 82,883,240	\$	(2,756,020)	(3.3%)
RESERVE INCREASE (DECREASE)	\$	1,419,777	\$ (1,727,689)	\$	3,147,466	(182.2%)
FTEs		208.8	213.4		(4.6)	(2.2%)

<sup>\*</sup> Excludes depreciation expense

Following is a brief description of variances by category, as illustrated in the table above:

- Revenues are over budget primarily due to CRISP third-party funding being higher than budget and is partially offset by lower than budgeted investment income due to lower interest rates.
- Personnel expenses are under budget mainly because of lower medical insurance premiums due to lower rates and fewer FTEs, lower parking and transportation benefits due to the pandemic, and lower relocation and training costs.
- Meetings and Travel expenses are under budget because of reduced in-person meetings and travel due to the pandemic.

<sup>\*\*</sup> A positive amount indicates that NERC is paying off more principal than it is receiving in proceeds. A negative amount indicates that NERC is receiving more in proceeds than it is paying off principal.



Contracts and Consultants expenses are slightly under budget because of CRISP third party pilot
program contractor costs being lower than budget and are partially offset by higher internal audit
and corporate risk management support, as well as IT cybersecurity contractor support needed
due the rapidly changing security environment.

	YTD		D YTD		YTD		%
CONTRACTS and CONSULTANTS		Actual		Budget	Ove	er (Under)	Over (Under)
Reliability Standards and Power Risk Issue Management	\$	239,798	\$	114,552	\$	125,246	109.3%
Compliance Assurance		175,295		50,000		125,295	250.6%
Registration and Certification		41,760		39,552		2,208	5.6%
Compliance Enforcement		38,070		69,000		(30,930)	(44.8%)
BPS Security and Grid Transformation		24,064		-		24,064	0.0%
Reliability Assessment and Technical Committees		130,680		59,552		71,128	119.4%
Advanced System Analytics and Modeling & Power System Analysis		114,750		165,000		(50,250)	(30.5%)
Performance Analysis		138,105		178,651		(40,546)	(22.7%)
Situation Awareness		=		15,000		(15,000)	(100.0%)
Event Analysis		86,445		115,590		(29,145)	(25.2%)
E-ISAC		2,334,751		2,399,918		(65,167)	(2.7%)
Training, Education and Personnel Certification		422,867		558,650		(135,783)	(24.3%)
General and Administrative and Executive		50,514		-		50,514	0.0%
Legal and Regulatory		501,450		210,000		291,450	138.8%
External Affairs		36,660		20,000		16,660	83.3%
Information Technology		1,966,270		1,635,625		330,645	20.2%
Human Resources and Administration		604,253		610,000		(5,747)	(0.9%)
Finance and Accounting		108,927		125,000		(16,073)	(12.9%)
TOTAL (excluding CRISP)	\$	7,014,659	\$	6,366,090	\$	648,569	10.2%
CRISP		5,570,952		6,325,723		(754,771)	(11.9%)
TOTAL (including CRISP)	\$	12,585,611	\$	12,691,813	\$	(106,202)	(0.8%)

- Office cost expenses are over budget primarily because of higher software license and support costs, a portion of which is being funded with the CRISP Special Projects reserve.
- Professional Services expenses are over budget largely due to fees for an additional NERC trustee and increased costs for liability insurance.
- Fixed Asset Additions are slightly over budget primarily because of the timing of approximately \$636k in expenditures for the ERO SEL project that were approved to be spent and financed in 2020, but were incurred and financed instead in 2021. This is partially offset by lower than budgeted spending for IT equipment and servers.
- The Net Financing Activity budget, which is comprised of financing proceeds and principal payments, did not contemplate NERC receiving loan proceeds in 2021, but due to the timing of expenditures on the ERO SEL capital investment, NERC borrowed approximately \$683k in 2021 to fund costs of the project primarily carried over from 2020. Accordingly, debt principal payments in 2021 were lower than budgeted since the loan did not occur until later in the year. The total borrowing for the ERO SEL project in 2020 and 2021 was \$25k less than the \$2.0 million approved



- by the NERC Board of Trustees in 2020 for the project initial investment, and the total capital costs incurred in 2020 and 2021 were slightly under the approved budget of \$3.8M.
- Reserves are higher than budget by \$3.1 million, primarily due to 1) reduced in-person meeting and travel costs due to the pandemic, 2) net financing activity due to loan proceeds received in 2021 and lower than budgeted loan principal payments, and 3) underspend in CRISP department contractor costs partially offset by overspend in other department contractor costs.



### **Variances by Department**

	YTD YTD		YTD	%
DIRECT EXPENSES, FIXED ASSETS, AND FINANCING ACTIVITY	Actual	Budget	Over (Under)	Over (Under)
Reliability Standards and Power Risk Issue Management	\$ 3,882,316	\$ 3,627,620	\$ 254,695	7.0%
Compliance Assurance	5,912,049	6,508,460	(596,412)	(9.2%)
Registration and Certification	1,134,145	1,248,210	(114,066)	(9.1%)
Compliance Enforcement	3,935,544	4,244,467	(308,923)	(7.3%)
Power System Analysis	319,629	428,239	(108,610)	(25.4%)
Reliability Assessment and Technical Committees	1,910,046	1,957,274	(47,228)	(2.4%)
Advanced System Analytics and Modeling & Power System Analysis	2,054,593	2,503,640	(449,047)	(17.9%)
Performance Analysis	1,351,982	1,665,414	(313,432)	(18.8%)
Situation Awareness	2,704,974	2,790,692	(85,718)	(3.1%)
Event Analysis	1,793,161	2,389,731	(596,569)	(25.0%)
E-ISAC	12,136,866	12,698,677	(561,812)	(4.4%)
Training, Education and Personnel Certification	1,488,063	1,635,119	(147,056)	(9.0%)
General and Administrative and Executive	8,637,544	8,445,444	192,100	2.3%
Legal and Regulatory	5,116,464	4,631,911	484,553	10.5%
External Affairs	2,854,179	2,859,325	(5,146)	(0.2%)
Information Technology	12,851,193	12,936,602	(85,409)	(0.7%)
Human Resources and Administration	2,765,661	2,775,720	(10,059)	(0.4%)
Finance and Accounting	2,075,831	2,052,043	23,789	1.2%
TOTAL (excluding CRISP)	\$ 72,924,241	\$ 75,398,589	\$ (2,474,348)	(3.3%)
CRISP	7,202,980	7,484,651	(281,671)	(3.8%)
TOTAL DIRECT EXPENSES, FIXED ASSETS, AND FINANCING ACTIVITY	\$ 80,127,220	\$ 82,883,240	\$ (2,756,020)	(3.3%)

Following is a brief description of significant variances by department, as illustrated in the table above:

- Reliability Standards and Power Risk Issue Management Over budget in personnel costs mainly
  due to the repurposing of one FTE from the Advanced System Analytics and Modeling & Power
  System Analysis department to this department, as well as higher than budgeted contractor costs,
  partially offset by lower meeting and travel expenses.
- <u>Compliance Assurance</u> Under budget largely because of lower personnel costs due to lower FTEs, as well as lower meeting and travel expenses, partially offset by higher contractor costs.
- <u>Compliance Enforcement</u> Under budget primarily attributable to lower personnel costs because of lower FTEs and also because of lower travel costs.
- Advanced System Analytics and Modeling & Power System Analysis Under budget largely due to the repurposing of one FTE to the Reliability Standards and Risk Issue Management department and also because of lower travel and software license and support costs.
- <u>Performance Analysis</u> Under budget mainly because of personnel expenses due to lower FTEs than budgeted and also because of lower travel expenses.
- <u>Event Analysis</u> Under budget primarily attributable to lower personnel expenses due to the transfer of an open FTE position to Situation Awareness and also because of lower travel expenses.



- <u>E-ISAC</u> Under budget mostly because of lower personnel expenses due to the allocation of part of an FTE to support administrative department projects, and lower travel and meeting expenses.
- <u>Legal and Regulatory</u> Over budget primarily due to contract and consultants expense for internal
  audit staff augmentation and support for corporate risk management initiatives, outside counsel
  support for the Atlanta and DC office lease negotiations, and higher personnel expenses because
  of transition costs.
- <u>CRISP</u> Under budget largely as a result of lower third party contractor and pilot contractor costs, partially offset by higher software license and liability insurance costs.



# **Supplemental Schedules**

#### Schedule 1 – Year-End Actual Reserves

	1/1/2021					C	Operating and	rating and 12/3		
	Beginning		Budgeted	Unbu	ıdgeted	Fin	nancing Activity		Ending	
Reserve Account	 Balance <sup>(1)</sup>	Fun	Funding/(Use) (2)		ng/(Use)	Versus Budget (3)		E	Balance	
NERC Operating Contingency	\$ 7,982,913	\$	(1,800,000)	\$	-	\$	2,551,666	\$	8,734,579	
Future Obligations	1,657,901		(551,600)		275,542		-		1,381,843	
Assessment Stabilization	2,521,000		-		-		-		2,521,000	
System Operator	996,220		-		-		(77,010)		919,210	
CRISP Defense Fund	500,000		-		-		-		500,000	
CRISP Operating <sup>(4)</sup>	-		-		1,419,796		-		1,419,796	
CRISP Special Projects (5)	1,049,549		-		(674,675)		-		374,874	
Total Reserves	\$ 14,707,584	\$	(2,351,600)	\$	1,020,663	\$	2,474,655	<b>;</b>	15,851,303	

#### NOTES

- (1) 2021 beginning balances have been adjusted from the 12/31/2020 variance report balances as the result of a reconciliation to the final audited balance sheet.
- (2) The 2021 Business Plan & Budget contained a budgeted use of Operating Contingency Reserves totaling \$1,800,000 to lower assessments for costs associated with the Compliance Monitoring and Enforcement Program Align project. The Future Obligations Reserve decrease of \$551,600 is a budgeted use of deferred rent reserves to fund a portion of office lease costs.
- (3) This column primarily reflects the net impact of normal operations. For example, under normal circumstances, if tracking well under budget in actual expenditures, this would reflect additional funds into the reserve account. It also reflects the increase or decrease in working capital during the period.
- (4) On November 17, 2021, an amendment to the CRISP contract was sent to the CRISP participants stipulating that any unspent funds collected from the CRISP participants will be directed to a new CRISP Operating Reserve category exclusively for CRISP use, starting with 2021 funds. The amendment has been signed by all CRISP participants. This treatment of excess current year funding received from CRISP participants above actual expenses being placed in reserve is a departure from prior practice, which was to return unspent money to the participants in the following budget year.

\$600k of the money that will fund the CRISP Operating Reserve was approved via the 2021 Business Plan & Budget to be spent in 2021, but due to other CRISP projects undertaken during the year, it was not spent, and the current plan is to spend it on a project in 2022 that was approved by the participants in 2021.

(5) The money remaining in the CRISP Special Projects Reserve at the end of 2021, which was specifically for operational technology pilot projects, is from approximately \$1.0M of funding collected in and unable to be spent in 2020 that was expected to be spent on the same projects in 2021. However, due to other CRISP priorities and supply chain demands, the remainder was unable to be spent in 2021 and is anticipated to be spent on the same projects in 2022.



# Schedule 2 – IT Projects

		Expected							
Projects in Progress		Project Budget <sup>(1)</sup>		Spend to Date		Expected Spend		Over (Under) Budget	
Align Initial Development through Release 3	\$	7,203,000	\$	7,249,618	\$	7,249,618	\$	46,618	
E-ISAC Portal Replacement		259,680		259,680		259,680		-	
CRISP Dragos Operational Technology Pilot		426,000		299,675		426,600		-	

	Project	Actual
Projects Completed in 2021	 Budget <sup>(1)</sup>	Spend
Secure Evidence Locker	\$ 2,265,000	\$ 2,171,312
Mobile Device Management/Laptop Build	36,000	62,573
SAFNR Disaster Recovery	78,516	67,372

#### NOTES:

(1) The Project Budget noted above usually corresponds to the approved business case for each project and funds for each project are drawn from the available budget. In some projects, business cases may not be prepared, particularly when a project is smaller and/or may be in response to a FERC order.

<sup>\*</sup> Some of these projects span multiple years, so the amounts above do not represent a single budget year expenditure.

<sup>\*</sup> The amounts noted above do not include internal labor or license/maintenance/support costs and reflect only external (consultant) costs of the projects.



# Schedule 2 (continued) - IT Projects

### Align Initial Development through Release 3

(Started Q2 2017 / Release 3 Completed Q4 2021)

This project will provide registered entities, Regional Entities, and NERC the ability manage the compliance and enforcement processes and data in a single ERO Enterprise system. Today, those processes and related data are managed across three separate systems that have to be synchronized (webCDMS, CITS, and CRATS). Release 4 to be completed in 2022.

#### **CRISP Dragos Operational Technology Pilot**

(Started Q4 2020 / Planned Completion Q1 2022)

The objective of this project is to measure the capabilities of the Dragos Platform to evaluate cyber security risks based upon data made available through CRISP. Additionally, the pilot will promote E-ISAC analyst training and capabilities through guided-hunt participation and development of other cyber security threat intelligence best practices (such as generation of analytics and playbooks). The one-year pilot will be funded through CRISP and benefit its participants, but will enrich the overall threat intelligence capabilities of the E-ISAC.

#### **E-ISAC Portal Replacement**

(Started Q3 2020 / Planned Completion Q1 2022)

This project will re-platform the current portal and ticket/case system, which will combine the functions and services into a single E-ISAC Sharing Platform (ESP) solution, allowing members, partners, and the E-ISAC staff to interact more effectively and efficiently.

#### **Secure Evidence Locker**

(Started Q2 2020 / Completed Q1 2021)

This is a key component of the NERC's reimagined suite of Compliance Monitoring and Enforcement Program (CMEP) work and data management tools and is being implemented in conjunction with Align. It will be used for the collection and analysis of evidence provided by registered entities in connection with CMEP activities.

#### Mobile Device Management/Laptop Build

(Started Q1 2021 / Completed Q2 2021)

This project provided NERC with the capability to secure mobile devices and send laptops to remote employees while having most of the build completed remotely, thereby reducing the time required to build the laptop in the office and then ship to employees.

#### **SAFNR Disaster Recovery**

(Started Q3 2020 / Completed Q3 2021)

This project involved the installation of a redundant instance of the SAFNR application in NERC's data warehouse to be activated in a disaster recovery situation should the primary site become physically unavailable.



# **Schedule 3 – E-ISAC and CRISP Summary of Activity**

	Annual	Annual		
FUNDING	 Actual	Budget	Ov	er (Under)
Assessments	\$ 22,673,035	\$ 22,673,035	\$	0
Other Funding	7,736,916	7,148,703		588,213
TOTAL FUNDING	\$ 30,409,951	\$ 29,821,738	\$	588,213
<u>EXPENDITURES</u>				
Personnel Expense	\$ 9,337,275	\$ 9,463,819	\$	(126,544)
Meetings and Travel Expense	52,140	297,080		(244,940)
Operating Expenses (excluding Depreciation)	9,920,429	10,339,429		(419,000)
Other Non-Operating Expenses	-	-		-
Fixed Asset Purchases (excluding Fixed Asset Allocation)	30,000	83,000		(53,000)
Net Financing Activity (excluding Net Financing Activity Allocation)	-	-		-
Total Direct Costs (excluding Depreciation and Allocations)	\$ 19,339,845	\$ 20,183,328	\$	(843,483)
Indirect Expense Allocation	10,163,290	9,315,576		847,714
Fixed Asset Allocation	69,803	188,624		(118,821)
Net Financing Activity Allocation	115,767	134,209		(18,442)
TOTAL EXPENDITURES (excluding Depreciation, including Allocations)	\$ 29,688,705	\$ 29,821,738	\$	(133,033)
RESERVE INCREASE (DECREASE)	\$ 721,246	\$ 0	\$	721,246



# Schedule 3 (continued) – E-ISAC and CRISP Summary of Activity

### CRISP

	Annual	Annual		
FUNDING	Actual	Budget	O	ver (Under)
Assessments	\$ 1,095,863	\$ 1,095,863	\$	0
Other Funding	7,675,197	7,100,343		574,854
TOTAL FUNDING	\$ 8,771,060	\$ 8,196,207	\$	574,854
<u>EXPENDITURES</u>				
Personnel Expense	\$ 904,300	\$ 833,011	\$	71,289
Meetings and Travel Expense	27,574	28,939		(1,365)
Operating Expenses (excluding Depreciation)	6,241,106	6,572,701		(331,595)
Other Non-Operating Expenses	-	-		-
Fixed Asset Purchases (excluding Fixed Asset Allocation)	30,000	50,000		(20,000)
Net Financing Activity (excluding Net Financing Activity Allocation)	 -	-		
Total Direct Costs (excluding Depreciation and Allocations)	\$ 7,202,980	\$ 7,484,651	\$	(281,671)
Indirect Expense Allocation	930,008	687,687		242,321
Fixed Asset Allocation	6,387	13,946		(7,559)
Net Financing Activity Allocation	10,593	9,923		671
TOTAL EXPENDITURES (excluding Depreciation, including Allocations)	\$ 8,149,968	\$ 8,196,207	\$	(46,238)
RESERVE INCREASE (DECREASE)	\$ 621,092	\$ (0)	\$	621,092

# E-ISAC (excluding CRISP)

	Annual	Annual		
FUNDING	Actual	Budget	O۱	er (Under)
Assessments	\$ 21,577,172	\$ 21,577,172	\$	0
Other Funding	 61,719	48,360		13,359
TOTAL FUNDING	\$ 21,638,891	\$ 21,625,531	\$	13,359
<u>EXPENDITURES</u>				
Personnel Expense	\$ 8,432,975	\$ 8,630,809	\$	(197,833)
Meetings and Travel Expense	24,567	268,141		(243,574)
Operating Expenses (excluding Depreciation)	3,679,324	3,766,728		(87,404)
Other Non-Operating Expenses	-	-		-
Fixed Asset Purchases (excluding Fixed Asset Allocation)	-	33,000		(33,000)
Net Financing Activity (excluding Net Financing Activity Allocation)	-	-		_
Total Direct Costs (excluding Depreciation and Allocations)	\$ 12,136,866	\$ 12,698,677	\$	(561,812)
Indirect Expense Allocation	9,233,282	8,627,890		605,393
Fixed Asset Allocation	63,415	174,678		(111,263)
Net Financing Activity Allocation	105,174	124,286		(19,113)
TOTAL EXPENDITURES (excluding Depreciation, including Allocations)	\$ 21,538,737	\$ 21,625,531	\$	(86,794)
RESERVE INCREASE (DECREASE)	\$ 100,154	\$ 0	\$	100,154



# **Schedule 4 – Summary of Investments**

						Average
	Quarter-End Balance		Ticker		S&P	Annualized
			Symbol	Fund Name	Credit Rating	Yield
Cash Sweep Accounts						
Operating Account Sweep	\$	22,716,643	TDDXX	BlackRock Liquidity Fund FedFund Dollar	AAAm	0.03%
SOCCED Account Sweep		1,597,833	TDDXX	BlackRock Liquidity Fund FedFund Dollar	AAAm	0.03%
CRISP Account Sweep		4,604,020	TDDXX	BlackRock Liquidity Fund FedFund Dollar	AAAm	0.03%
Total Cash Sweep Accounts	\$	28,918,496				
Investment Account						
Reserve Funds	\$	8,471,776	GRTXX	Federated Hermes Government Obligations Fund	AAAm	0.03%
Total Investments	\$	8,471,776				