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**UNITED STATES OF AMERICA  
BEFORE THE  
FEDERAL ENERGY REGULATORY COMMISSION**

**North American Electric Reliability Corporation** )  
 )

**Docket No. RD20-2-000**

**INFORMATIONAL FILING OF THE NORTH AMERICAN ELECTRIC RELIABILITY CORPORATION REGARDING STANDARDS DEVELOPMENT PROJECTS**

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June 15, 2021

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Pursuant to paragraph 5 of the Order Directing Informational Filings Regarding NERC Standard Drafting Projects,<sup>1</sup> the North American Electric Reliability Corporation (“NERC”)<sup>2</sup> hereby submits to the Federal Energy Regulatory Commission (“FERC” or the “Commission”) an informational filing regarding two active Critical Infrastructure Protection (“CIP”) standard development projects: (1) Project 2016-02 – Modifications to CIP Standards (“Project 2016-02”); and (2) Project 2019-02 – BES Cyber System Information Access Management (“Project 2019-02”).<sup>3</sup> Project 2016-02 focuses on modifications to the CIP Reliability Standards to incorporate applicable protections for virtualized environments. Project 2019-02 proposes to enhance the CIP standards by providing a secure path toward the use of third-party data storage and analysis systems and by clarifying the protections expected when using cloud computing services. This informational filing provides an update to the current schedules for both projects.

**I. BACKGROUND**

In the February 20 Order, the Commission directed NERC to submit, within 30 days of the issuance of the Order, an informational filing that includes project schedules for Projects 2016-02

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<sup>1</sup> *N. Am. Elec. Reliability Corp.*, “Order Directing Informational Filings Regarding NERC Standard Drafting Projects,” 170 FERC ¶ 61,109 (Feb. 20, 2020) [hereinafter February 20 Order].

<sup>2</sup> The Commission certified NERC as the electric reliability organization (“ERO”) in accordance with Section 215 of the FPA on July 20, 2006. *N. Am. Elec. Reliability Corp.*, 116 FERC ¶ 61,062 (2006).

<sup>3</sup> Unless otherwise designated, all capitalized terms shall have the meaning set forth in the *Glossary of Terms Used in NERC Reliability Standards*, [https://www.nerc.com/files/Glossary\\_of\\_Terms.pdf](https://www.nerc.com/files/Glossary_of_Terms.pdf).

and 2019-02.<sup>4</sup> The Commission stated that these schedules should include the status of the projects, interim target dates, and the anticipated filing date for new or modified Reliability Standards. In addition, the Commission directed NERC to file quarterly informational status updates, beginning in June 2020, until NERC files new or modified standards with the Commission.<sup>5</sup>

NERC provided the initial informational filing regarding the schedules on March 19, 2020<sup>6</sup> and four additional quarterly informational filings with updated schedules on June 19, 2020,<sup>7</sup> September 17, 2020,<sup>8</sup> December 15, 2020,<sup>9</sup> and March 15, 2021.<sup>10</sup> NERC also provided a supplemental informational filing on November 13, 2020.<sup>11</sup>

## II. PROJECT SCHEDULES

The schedules for Project 2016-02 and Project 2019-02, shown below, reflect some adjustments since the March 2021 Informational Filing to coordinate completion of both projects. The Project 2019-02 revisions to Reliability Standards CIP-004-6 and CIP-011-2 achieved a sufficient number of affirmative votes to pass additional ballot and final ballot. As such, the next step for Project 2019-02 is NERC Board of Trustees adoption of the revisions prior to being filed with the Commission for approval. At this time, NERC is considering whether to present the Project 2019-02 revisions to the NERC Board of Trustees separately from the Project 2016-02

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<sup>4</sup> February 20 Order, *supra* note 1, at P 5.

<sup>5</sup> *Id.*

<sup>6</sup> NERC, *Informational Filing of the North American Electric Reliability Corporation Regarding Standards Development Projects*, Docket No. RD20-2-000 (March 19, 2020).

<sup>7</sup> NERC, *Informational Filing of the North American Electric Reliability Corporation Regarding Standards Development Projects*, Docket No. RD20-2-000 (June 19, 2020).

<sup>8</sup> NERC, *Informational Filing of the North American Electric Reliability Corporation Regarding Standards Development Projects*, Docket No. RD20-2-000 (September 17, 2020).

<sup>9</sup> NERC, *Informational Filing of the North American Electric Reliability Corporation Regarding Standards Development Projects*, Docket No. RD20-2-000 (December 15, 2020).

<sup>10</sup> NERC, *Informational Filing of the North American Electric Reliability Corporation Regarding Standards Development Projects*, Docket No. RD20-2-000 (March 15, 2021) [hereinafter March 2021 Informational Filing].

<sup>11</sup> NERC, *Supplemental Informational Filing of the North American Electric Reliability Corporation Regarding Standards Development Projects*, Docket No. RD20-2-000 (November 13, 2020).

revisions or to include all CIP revisions as one package. If the Project 2019-02 revisions to CIP-004-6 and CIP-011-2 are presented separately, NERC may submit them to the NERC Board of Trustees at its August meeting, which would be earlier than the schedule below providing for a November Board of Trustees adoption.

Given the ballot approval of the Project 2019-02 revisions, NERC adjusted the Project 2016-02 schedule for the upcoming additional comment period by one month. This will allow the Project 2016-02 team to incorporate the Project 2019-02 revisions into its postings regarding virtualization modifications to CIP-004-6 and CIP-011-2. NERC notes that these schedules are projections and subject to change but anticipates completing both these projects by the end of the year as detailed below. Any changes will be reported in the next informational filing scheduled for September 2021.

#### Project 2016-02 Modifications to CIP Standards

- Additional 45-day formal comment period and ballot (if needed): To be posted ~~May~~ **June** 2021
- Additional 45-day formal comment period and ballot (if needed): To be posted August 2021
- Final ballot: To be posted October 2021
- NERC Board of Trustees Adoption: November 2021
- FERC Filing: December 2021

#### Project 2019-02 BES Cyber System Information Access Management Schedule

- Final ballot: Posted ~~August~~ **June** 2021
- NERC Board of Trustees Adoption: November 2021
- FERC Filing: December 2021

### III. CONCLUSION

At the time of this filing, Project 2016-02 and Project 2019-02 remain on schedule as provided herein. If any changes occur to the projects' status, target dates, or anticipated filing dates, NERC will provide these changes in its quarterly informational filings submitted pursuant to the directive in the February 20 Order.

Respectfully submitted,

/s/ Marisa Hecht

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*Counsel for the North American Electric  
Reliability Corporation*

June 15, 2021

**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 the above-referenced proceeding.

Dated at Washington, D.C. this 15th day of June, 2021.

*/s/ Marisa Hecht*

Marisa Hecht  
*Counsel for North American  
Electric Reliability Corporation*