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

**North American Electric Reliability
Corporation**

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Docket No. RR09-6-003

**NORTH AMERICAN ELECTRIC RELIABILITY CORPORATION
STANDARDS REPORT, STATUS AND TIMETABLE FOR
ADDRESSING REGULATORY DIRECTIVES**

Lauren A. Perotti
Senior Counsel
North American Electric Reliability
Corporation
1325 G Street, N.W., Suite 600
Washington, D.C. 20005
202-400-3000
lauren.perotti@nerc.net

*Counsel for the North American Electric
Reliability Corporation*

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TABLE OF CONTENTS

I.	SUMMARY	1
II.	NOTICES AND COMMUNICATIONS.....	2
III.	COMPLETED DIRECTIVES.....	2
IV.	ONGOING DIRECTIVES.....	3
V.	CONCLUSION	6

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The North American Electric Reliability Corporation (“NERC”) hereby submits the 2021 NERC Standards Report, Status and Timetable for Addressing Regulatory Directives (the “Directives Report”) in accordance with Section 321.6 of the NERC Rules of Procedure (“ROP”).¹ This annual report summarizes the progress made and plans for addressing the Reliability Standard-related directives issued by applicable governmental authorities.

Section 321.6 of NERC’s ROP requires NERC, on or before March 31 of each year, to file a report with applicable governmental authorities on the status and timetable for addressing each outstanding regulatory directive.

I. SUMMARY

As discussed below, since NERC’s 2020 annual directives report filed on March 30, 2020, the Commission has issued two new directives related to Reliability Standards. In that time, NERC filed a petition with the Commission addressing one Reliability Standard-related directive.² Currently, there are ten outstanding directives related to Reliability Standards or issued in orders approving Reliability Standards. NERC is addressing two of these directives through standards development projects. NERC is addressing a third directive through quarterly reporting of development project status. The other outstanding directives relate to data gathering, registration, or the performance of research or studies and are being addressed through other mechanisms.³

¹ The Federal Energy Regulatory Commission (“FERC” or “Commission”) approved Rule 321 on March 17, 2011 in the above captioned docket. *N. Am. Elec. Reliability Corp., Order on Compliance Filing*, 134 FERC ¶ 61,216 (2011).

² See Table 1 below for the directive that was addressed since March 30, 2020.

³ See Table 2 below for a list of outstanding directives and their status.

The 2021-2023 Reliability Standards Development Plan (“RSDP”) provides a plan to address the remaining Reliability Standards-related directives. NERC’s annual RSDP establishes priorities related to Reliability Standards to help ensure that those issues that most directly impact Bulk-Power System reliability are addressed first. Directives to create new or modify existing Reliability Standards are assigned to existing or future development projects that are prioritized by the NERC Standards Committee and are reflected in the RSDP. The 2021-2023 RSDP was filed with the Commission on December 8, 2020.⁴

II. NOTICES AND COMMUNICATIONS

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

Lauren A. Perotti
Senior Counsel
North American Electric Reliability Corporation
1325 G Street, N.W., Suite 600
Washington, D.C. 20005
202-400-3000
lauren.perotti@nerc.net

III. COMPLETED DIRECTIVES

The tables below contain a status update on the FERC directives. Table 1 contains a complete list of the directives NERC addressed since the 2020 directives report. Table 2 in the next section provides a list of the outstanding directives and an update on NERC’s plans to address those directives.

⁴ NERC’s 2021-2023 RSDP is available here:
https://www.nerc.com/FilingsOrders/us/NERC%20Filings%20to%20FERC%20DL/2021-2023%20RSDP%20Filing_packaged.pdf.

Table 1: Directives Addressed since March 30, 2020

Directive Summary	Action Taken	Standards Project Name	Filing Date
<p>Order No. 850 165 FERC ¶ 61,020 ¶ 30: “[W]e direct NERC to develop modifications to the CIP Reliability Standards to include EACMS within the scope of the supply chain risk management Reliability Standards. We direct NERC to submit the directed modifications within 24 months of the effective date of this final rule.”</p>	<p>NERC submitted its petition for approval of proposed Reliability Standards CIP-013-2, CIP-005-7, and CIP-010-4 addressing supply chain cybersecurity risk management.</p>	<p>2019-03 Supply Chain Risks</p>	<p>12/14/20 in RD21-2-000. Approved by FERC in 174 FERC ¶ 61,193 on 3/18/21.</p>

IV. ONGOING DIRECTIVES

Table 2 below shows the currently outstanding directives from FERC.

Table 2: Ongoing Directives

Order & Directive Summary	Date & Docket	Standards Project Name	Status
<p>Order No. 777 (S-Ref 10871) (142 FERC ¶ 61,208) ¶ 6: “[W]e also direct NERC to develop a means to assure that IROLs are communicated to transmission owners.” ¶ 41: “NERC should establish a clearly defined communication structure to assure that IROLs and changes to IROL status are timely communicated to transmission owners.” ¶ 42: “We encourage NERC to inform us when it has developed means for communication of IROLs to transmission owners to help ensure that they receive notice of each of their applicable lines before the [FAC-003-2] standard becomes effective as to those lines. [that is, ‘twelve months after the date a line operated below 200 kV is initially designated as an element of an IROL’]”</p>	<p>3/21/13 RM12-4-000</p>	<p>2015-09(b) Establish and Communicate System Operating Limits</p>	<p>Ongoing; FAC-014-3 posted for comment through 4/5/21. Once FAC-014 passes, all standards and definitions will be posted for a final ballot.</p>
<p>Order No. 706 (S-Ref 10820) (122 FERC ¶ 61,040) ¶ 51: “[The Commission] believe[s] that NERC should register demand side aggregators if the loss of their load shedding capability, for reasons such as a cyber incident, would affect the reliability or operability of the Bulk-Power System.” “NERC should consider whether there is a current need to register demand side aggregators and, if so, to address any related issues and develop criteria for their registration.”</p>	<p>1/18/08 RM06-22-000</p>	<p>n/a</p>	<p>Ongoing.</p>

Order & Directive Summary	Date & Docket	Standards Project Name	Status
<p>Order No. 830 (S-Ref 10957) (156 FERC ¶ 61,215) ¶ 89: “[T]he Commission directs NERC, pursuant to Section 1600 of the NERC Rules of Procedure, to collect GIC monitoring and magnetometer data from registered entities for the period beginning May 2013, including both data existing as of the date of this order and new data going forward, and to make that information available.”</p>	<p>9/22/16 RM15-11-000</p>	<p>n/a</p>	<p>Ongoing. Entities were required to begin mandatory collection during designated GMD events beginning October 1, 2020. The first collection period will end on March 31, 2021. The first reporting deadline is June 30, 2021.</p>
<p>Order No. 843 (163 FERC ¶ 61,032) ¶ 30: “[W]e... direct NERC to conduct a study to assess the implementation of Reliability Standard CIP-003-7. The study should address what electronic access controls entities choose to implement and under what circumstances, and whether the electronic access controls adopted by responsible entities provide adequate security, as well as other relevant information found by NERC as a result of the study. NERC must file the study within eighteen months of the effective date of Reliability Standard CIP-003-7.”</p>	<p>4/19/18 RM17-11-000</p>	<p>n/a</p>	<p>Due 7/1/21. On track to be filed by deadline.</p>
<p>Order No. 848 (164 FERC ¶ 61,033) ¶ 90: “We also find that it is reasonable for NERC to file annually an anonymized report providing an aggregated summary of the reported information, similar to the ICS-CERT annual report. The annual report will provide the Commission, NERC, and the public a better understanding of any Cyber Security Incidents that occurred during the prior year without releasing information on specific responsible entities or Cyber Security Events.”</p>	<p>7/19/18 RM18-2-000</p>	<p>n/a</p>	<p>Ongoing. On track to file first report of information reported under CIP-008-6 (eff. Jan 1, 2021) by the deadline.</p>
<p>Order No. 851 (165 FERC ¶ 61,124) ¶ 30: “[W]e direct NERC to prepare and submit a report addressing how often and why applicable entities are exceeding corrective action plan deadlines as well as the disposition of time extension requests. The report is due within 12 months from the date on which applicable entities must comply with the last requirement of Reliability Standard TPL-007-2.”</p>	<p>11/15/18 RM10-8-000</p>	<p>n/a</p>	<p>Due 1/1/25. FERC approved TPL-007-4 on 3/19/20. On track to be filed by the deadline.</p>

Order & Directive Summary	Date & Docket	Standards Project Name	Status
<p>Order No. 866 (170 FERC ¶ 61,031) ¶ 36: “[W]e direct that NERC develop modifications to the CIP Reliability Standards to require protections regarding the availability of communication links and data communicated between bulk electric system Control Centers.”</p>	<p>1/23/20 RM18-20-000</p>	<p>2020-04 Modifications to CIP-012</p>	<p>In standards development under Project 2020-04.</p>
<p>Order Directing Informational Filings Regarding NERC Standard Drafting Projects (170 FERC ¶ 61,109) “NERC is directed to file quarterly status updates on Project 2016-02 and Project 2019-02, on an informational basis, starting 120 days from the date of issuance of this order.”</p>	<p>2/20/20 RD20-2-000</p>	<p>2016-02 Modifications to CIP Standards 2019-02 BES Cyber System Information Access Management</p>	<p>Ongoing. Informational filings submitted quarterly: 3/19/20, 6/19/20, 9/17/20, 11/13/20, 12/15/20, and 3/15/21.</p>
<p>Order Directing Informational Filing (173 FERC ¶ 61,243) ¶ 17: “[W]e direct NERC to begin a formal process to assess the feasibility of voluntarily conducting BES operations in the cloud in a secure manner”</p>	<p>12/17/20 RM20-8-000</p>	<p>n/a</p>	<p>In progress.</p>
<p>Order Directing Informational Filing (173 FERC ¶ 61,243) ¶ 17-19: “We direct NERC... to make an informational filing by January 1, 2022 that evaluates potential modifications to the CIP Reliability Standards to facilitate expanded use of the cloud, including to perform BES operations. The informational filing should report on any new or future NERC standard drafting projects, their status and schedule.”</p>	<p>12/17/20 RM20-8-000</p>	<p>n/a</p>	<p>In progress. On track to be filed by the Jan. 1, 2022 deadline.</p>

V. CONCLUSION

NERC is continuing to work closely with industry stakeholders and FERC to resolve all outstanding directives. NERC respectfully requests that the Commission accept this informational filing.

Respectfully submitted,

/s/ Lauren A. Perotti

Lauren A. Perotti

Senior Counsel

North American Electric Reliability Corporation

1325 G St., NW, Suite 600

Washington, DC 20005

202-400-3000

lauren.perotti@nerc.net

Counsel to the North American Electric Reliability Corporation

Date: March 29, 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 29th day of March, 2021.

/s/ Lauren A. Perotti

Lauren A. Perotti

*Counsel for North American
Electric Reliability Corporation*