
**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**

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The 2022-2024 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 2022-2024 RSDP was filed with the Commission on November 30, 2021.⁴

II. NOTICES AND COMMUNICATIONS

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

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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 2021 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 2022-2024 RSDP is available here:
<https://www.nerc.com/FilingsOrders/us/NERC%20Filings%20to%20FERC%20DL/2022-2024%20RSDP%20FERC%20Filing.pdf>.

Table 1: Directives Addressed since March 29, 2021

Directive Summary	Action Taken	Standards Project Name	Filing Date
<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>The ERO Enterprise conducted a study of approximately 200 registered entities with assets containing low impact BES Cyber Systems regarding: (1) what electronic access controls entities chose to implement and under what circumstances at these assets; (2) whether the electronic access controls adopted by entities provide adequate security; and (3) other relevant information found by the ERO Enterprise as a result of the study. The study was submitted to FERC on June 30, 2021.</p>	<p>n/a</p>	<p>Filed on 6/30/21 in Docket No. RM17-11-000.</p>
<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>NERC developed proposed Reliability Standards to address IROL communications in accordance with Order No. 777.</p>	<p>2015-09(b) Establish and Communicate System Operating Limits</p>	<p>Filed on 6/28/21 in Docket No. RD22-2-000. FERC issued approval order 3/4/22.</p>

Directive Summary	Action Taken	Standards Project Name	Filing Date
<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>Informational Filing submitted to FERC on December 17, 2021.</p>	<p>n/a</p>	<p>Filed on 12/17/21 in Docket No. RM20-8-000.</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>NERC filed its Annual Report on Cyber Security Incidents on March 21, 2022 in Docket No. RM18-2-000 and will file annually moving forward.</p>	<p>n/a</p>	<p>Filed on 3/21/22 in Docket No. RM18-2-000.</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. 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. There are ongoing discussions within a Reliability and Security Technical Committee (“RSTC”) subgroup to evaluate demand side aggregators risk to the BPS.</p>
<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. On October 1, 2020, the GMD Reporting Application was released and became available for reporting, with initial data collections due June 30, 2021. NERC will hold a training in May of 2022 on how entities may access the data.</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>On track to be filed by the 1/1/25 deadline.</p>
<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>

Order & Directive Summary	Date & Docket	Standards Project Name	Status
<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: 6/15/21, 9/15/21, 12/15/21, and 3/15/22. Project 2019-02 completed and submitted for FERC approval on September 15, 2021 in Docket No. RD21-6-000.</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>NERC initiated a formal process to assess the feasibility of voluntarily conducting BES reliability operating services in the cloud in a secure manner as described in FERC’s filing on December 17, 2021. As part of this process, the NERC Security Integration and Technology Enablement Subcommittee (“SITES”) of the RSTC is working on a whitepaper.</p>
<p>Order No. 876 175 FERC ¶ 61,037 ¶ 27 (req data in ¶ 21): “[W]e...direct NERC and WECC to submit an informational filing 30 months following implementation of regional Reliability Standard BAL-002-WECC-3 containing a report that addresses the adequacy of contingency reserves in the Western Interconnection.”</p>	<p>4/15/21 RM19-20-000</p>	<p>n/a</p>	<p>NERC is working with WECC to address this directive. Will file a report by the 12/28/23 deadline, provided no issues are identified sooner.</p>

Order & Directive Summary	Date & Docket	Standards Project Name	Status
<p>Order No. 817 153 FERC ¶ 61,178 ¶ 27: While it appears that regional discrepancies exist regarding the manner for calculating IROLs, we accept NERC’s explanation that this issue is more appropriately addressed in NERC’s Facilities Design, Connections and Maintenance or “FAC” Reliability Standards. NERC indicates that an ongoing FAC-related standards development project - NERC Project 2015-09 (Establish and Communicate System Operating Limits) - will address the development and identification of SOLs and IROLs.</p> <p>We conclude that NERC’s explanation, that the Project 2015-09 standard drafting team will address the clarity and consistency of the requirements for establishing both SOLs and IROLs, is reasonable. Therefore, we will not direct further action on IROLs in the immediate TOP and IRO standard-related rulemaking. However, when this issue is considered in Project 2015-19, the specific regional difference of WECC’s 1,000 MW threshold in IROLs should be evaluated in light of the Commission’s directive in Order No. 802 (approving Reliability Standard CIP-014) to eliminate or clarify the “widespread” qualifier on “instability” as well as our statement in the Remand NOPR that “operators do not always foresee the consequences of exceeding such SOLs and thus cannot be sure of preventing harm to reliability.”</p>	<p>11/19/15 RM15-16-000</p>	<p>n/a</p>	<p>Ongoing. While not a formal directive, NERC explained in its 6/28/21 petition for approval of SOL Standards developed under Project 2015-19, filed in Docket No. RD22-2-000, how it will address this issue going forward (<i>see</i> petition at p. 10).</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

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Date: March 24, 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 24th day of March, 2022.

/s/ Lauren A. Perotti

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