

NERC

NORTH AMERICAN ELECTRIC
RELIABILITY CORPORATION

NERC Compliance and Certification Committee 2024 Work Plan

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RELIABILITY | RESILIENCE | SECURITY



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Introduction

The purpose of this Work Plan is to identify the anticipated activities and deliverables of the NERC Compliance and Certification Committee (CCC) for 2024. The plan is based on the responsibilities assigned to the CCC by the NERC Board of Trustees (Board) for programs across the ERO Enterprise and tasks identified by the CCC that are required to fulfill these responsibilities.

The Committee, as prescribed by January 2007 FERC Compliance order, upheld in the June 7, 2007 FERC Order's Key Provision 8, and enumerated in the NERC Rules of Procedure (ROP), regularly assesses NERC's adherence to the ROP for several of its programs as part of the Committee's ongoing work. As an industry committee independent of these programs, members are able to provide support and guidance relative to NERC's Compliance Monitoring and Enforcement Program (CMEP), Organization Registration and Certification Programs (ORCP), and Reliability Standards development. In 2024, the CCC will continue to work with policymakers and stakeholders to further refine the maturing and ongoing role for the CCC with respect to the ERO's adherence to its processes, procedures, and statutory obligations.

Many of the CCC projects and deliverables included in this Work Plan are intended to support the goals of the ERO Enterprise Operating Plan and the ERO Enterprise Long-term Strategy.

In addition, the CCC will support the ERO vision to address and prioritize emerging risks to reliability and security through active participation in the NERC Standing Committee Coordination Group (SCCG) and as a feedback loop in the ERO Enterprise *Framework to Address Known and Emerging Reliability and Security Risks*.

The CCC subcommittees and any subgroups established perform certain assigned tasks on behalf of and under the supervision of the CCC. In collaboration with ERO Enterprise Management, the CCC delegates responsibilities to the following subcommittees for projects and activities:

- Organization Registration and Certification Subcommittee (ORCS)
- ERO Monitoring Subcommittee (EROMS)
- CCC Nominating Subcommittee (NS)

The following pages represent an outline of the work plan deliverables and detailed project information.

Vision, Mission and Guiding Principles

Vision

Effective risk-based CMEP and ORCP implemented in a consistent manner that enable the ERO Enterprise to focus resources on risks to the reliability of the Bulk Power System (BPS) and risks specific to registered entities.

Mission

The CCC is a Board-appointed stakeholder committee serving and reporting directly to the Board. In that capacity under a FERC-approved charter, and as approved by the NERC Board, and set forth in NERC's ROP, the CCC will engage with, support, and advise the Board, the Board's Regulatory Oversight Committee (ROC) and the NERC Board of Trustees Enterprise-wide Risk Committee (EWRC) regarding all facets of the NERC CMEP and ORCP.

Guiding Principles

The CCC partners with NERC leadership on a variety of key NERC initiatives and criteria for evaluation and assessment of the effectiveness of NERC programs. To support this endeavor, the CCC develops an annual work plan to identify the activities that the CCC intends to perform each year to fulfill its responsibilities and any additional responsibilities the Board has established for the CCC.

The CCC provides for balanced discussion, commentary, and recommendations on compliance issues by bringing together a diversity of opinions and perspectives from NERC member sectors.

Members are appointed to the CCC by the Board and serve on the committee at the pleasure of the Board.

Individuals serving on the committee will generally include:

- senior-level industry experts who have familiarity, knowledge, and experience in the areas of compliance, compliance enforcement, compliance administration and management, organization registration, organization certification, and NERC and Regional standards.
- normally involved with internal compliance programs within their respective organizations.

Committee members are expected to support the interests of the sector they represent, to the best of their ability and judgment.

Chapter 1: Strategic Planning Efforts

The projects included in this category are intended to address succession planning within the CCC as well as clarify the CCC’s role in the broader scope of the maturation of the risk-based approach to reliability and security. Further details on these projects are shown in the following table.

Project Name	Activities	Resource(s)
Industry Collaboration and Communication	<ol style="list-style-type: none"> 1) Maintain direct involvement in the SCCG. 2) Enhance communications and participation with industry groups with a focused plan for coordination. 3) Ensure that materials developed for onboarding as members join the CCC and to provide to industry stakeholders looking for background information about the CCC are updated. 4) Create feedback loops with the Member Representatives Committee (MRC) and seek opportunities to create additional feedback loops with industry organizations as it relates to CMEP and ORCP activities. 5) Build upon the successful deployment of the ERO Stakeholder Perceptions Program. 	CCC, CCC Subcommittees
Enhancing CCC Program Efficiencies	<ol style="list-style-type: none"> 1) Continue evaluation of various activities and functions of subcommittees/working groups to determine ways to improve the effectiveness and efficiency of the CCC. 2) Periodically review EROMS, ORCS, and Nominating Subcommittee Scopes. 3) Explore opportunities to “cross train” across various CCC subcommittees. 4) Work with NERC to develop criteria to evaluate the goals, tools, and procedures of each Regional Entity Compliance Monitoring and Enforcement Program to determine the effectiveness of each Regional Entity Compliance Monitoring and Enforcement Program. 	CCC, CCC Subcommittees, NERC Standing Committees, NERC Management

Chapter 2: Ongoing Responsibilities

The table below summarizes the list of ongoing responsibilities assigned to the CCC. In general, responsibilities are divided into two primary categories: 1) activities that respond to the CCC Charter and the NERC ROP, and 2) activities that support the NERC mission. Further details on the deliverables and projects are discussed in the next section by project number identified below.

Project Name	Activities	Resource(s)
Review and Update of CMEP and CCC Programs and Procedures	<ol style="list-style-type: none"> 1) Review and monitor changes to the CMEP and other NERC initiatives that could require updates or changes to CCC programs and procedures. <ol style="list-style-type: none"> a) Annual evaluation and update of criteria for assessing effectiveness of RE CMEP activities, considering ERO input, to appropriately reflect program modification, improvements, and prior years' evaluations. b) Assess impact of risk-based CMEP implementation on: (a) monitoring practices (as embodied in CCCPP-010); (b) enforcement; and (c) Reliability Standards development. Assist NERC with annual evaluation of goals, tools, and procedures of each RE CMEP to determine effectiveness of each RE implementation of CMEP, using criteria developed by the CCC. c) Review the Board Compliance Guidance Policy with the MRC, provide stakeholder feedback on the programs and take associated actions to support improvements working in collaboration with NERC Management. d) Per the terms of CCCPP-011, conduct annual review of the criteria for approval to become an organization seeking to be pre-qualified to submit Implementation Guidance to the ERO Enterprise. 2) Evaluate and review CCC Charter, including functions and responsibilities, and any potential ROP changes impact. 3) Explore opportunities to "cross-train" among EROMS, ORCS and NS Subcommittees. 4) Work with NERC staff to continue to improve the CCC Webpage and communication with industry with additional outreach. 	CCC, CCC Subcommittees, NERC Management
Program Support Efforts (CMEP, Standards Development)	<ol style="list-style-type: none"> 1) Identify and participate in risk-based compliance assurance outreach, such as internal controls, and feedback discussions. 2) Support rollout of key activities or CMEP and ORCP program revisions in accordance with ERO enterprise goals as requested. 3) Partner with ERO Enterprise to provide feedback on <ol style="list-style-type: none"> a) Reliability Standards Audit Worksheet (RSAW) development, EROMS provides comments. b) CMEP Practice Guides, CCCEC provides comments, as requested. 4) Review and respond to stakeholder requests to become a pre-qualified entity to submit compliance implementation guidance. 5) Evaluate results and input on stakeholder perceptions and work with NERC management on proposed resolutions. 	CCC, CCCEC, EROMS, NERC Management

Chapter 2: Ongoing Responsibilities

Project Name	Activities	Resource(s)
	<ul style="list-style-type: none"> a) Hold “focus group” discussions that are intended to identify opportunities for the ERO Enterprise to drive specific improvements and information sharing across the ERO Enterprise. b) Participate on Align Users Group (CCC Chair, CCC Vice Chair, CCCEC Representative) 	
Assistance with Review of ERO documentation for ORCP	<ul style="list-style-type: none"> 1) Support review of ERO documentation for ORCP to identify revisions and make recommendations as programs mature. <ul style="list-style-type: none"> a) Provide additional guidance, as needed, to NERC Staff regarding the entity registration tool: Centralized Organization Registration ERO System (CORES). b) ORCS participates in Functional Mapping Focus Group. 	CCC, ORCS
Monitor NERC’s adherence to the ROP	<ul style="list-style-type: none"> 1) In coordination with NERC Internal Audit under Sections 405/406/506/Various NERC Appendices of the NERC ROP, participate as observers in audits of NERC in the areas of CMEP, ORCP, and Standards development, including review the final audit reports and report to the EWRC on industry observations and submit reporting where necessary. Work with NERC to develop criteria to evaluate the goals, tools, and procedures of each Regional Entity Compliance Monitoring and Enforcement Program to determine the effectiveness of each Regional Entity Compliance Monitoring and Enforcement Program. 	CCC, EROMS, NERC Internal Audit
ERO Regional Entity CMEP Audits	<ul style="list-style-type: none"> 1) As defined in CCCPP-012, participate as an observer to support RE CMEP audits executed by NERC’s Internal Audit and Corporate Risk Management function, consistent with Appendix 4A of the ROP. 	CCC, NERC Internal Audit
EWRC Collaboration	<ul style="list-style-type: none"> 1) Participate and support EWRC activities and discussions, <ul style="list-style-type: none"> a) Provide an update of CCC activities at each quarterly EWRC meeting. <ul style="list-style-type: none"> i) This may include review of results of Stakeholder Perception Report, update of CCC key quarterly activities, annual work plan, any topic requested by the ERWC. b) Provide summary findings related to ERO Stakeholder Perceptions conducted by CCC. 2) Participate in the annual ERO risk discussions with NERC Management and provide input into NERC’s annual risk assessment, as requested. 	CCC Leadership, EWRC and ERO Enterprise Management, NERC Director, Internal Audits
NERC Reliability Issues Steering Committee (RISC) Collaboration	<ul style="list-style-type: none"> 1) Provide input to existing risks, mitigation strategies, and emerging risk identification. <ul style="list-style-type: none"> a) Perform outreach with stakeholders to gather input for emerging risks. 2) Participate and support RISC activities and discussions, including Reliability Risk Leadership Summit, provide updates to CCC members. 	CCC Leadership, NERC Management
ERO Enterprise Program Alignment	<ul style="list-style-type: none"> 1) As noted in the 2017 ERO Alignment Effort, the CCC collaborates with the NERC and the REs, on the ERO Enterprise’s Program Alignment, to address alignment in the execution of both CMEP and the ORCP programs. To support the success of CMEP and ORCP, the CCC will <ul style="list-style-type: none"> a) At NERC’s request, assist NERC with screening of information, support further review of reported items, and provide suggested resolutions if warranted. 	CCC, CCCEC, NERC Management

Project Name	Activities	Resource(s)
	<ul style="list-style-type: none"> i) Gather information regarding potential alignment issues. ii) Evaluate nature and extent of the alignment issue. iii) Develop suggested resolution of the issue. iv) Present suggested resolution to the CCC for review and endorsement. v) Communicate suggested resolutions of alignment issue to the CCC to communicate to NERC. 	
Support of ERO Effectiveness	<ul style="list-style-type: none"> 1) Manage ERO Enterprise stakeholder perception program. <ul style="list-style-type: none"> a) Consistent with responsibilities outlined in CCCPP-008 (Program for Monitoring Stakeholders Perceptions), lead efforts to soliciting input from industry and the ERO Enterprise on objectives, content, and delivery of assessments of ERO effectiveness related to CMEP and ORCP. b) Evaluate results of assessments and provide recommendations for the ERO Enterprise and the Board. c) Periodically solicit input from the industry, including the MRC. 2) Support development efforts for assessments of ERO effectiveness. <ul style="list-style-type: none"> a) Work with NERC Management and the SCCG to continue to develop the processes between the NERC standing committees to ensure that all NERC committees represent a continuous improvement loop in support of reliability and security – further supporting the Framework to Address Known and Emerging Reliability and Security Risks. 3) Act as the hearing body where NERC is the Compliance Enforcement Authority and, as directed by the Board, serve as mediator between NERC and Regional Entities on CMEP disputes. 4) Provide stakeholder expertise to support the development and maturation of Align, Secure Evidence Locker and CORES. 	CCC, EROMS, NERC Management
Stakeholder Collaboration	<ul style="list-style-type: none"> 1) Identify industry stakeholder groups where CCC collaboration will strengthen ERO process and approach. <ul style="list-style-type: none"> a) Lead CCC task forces, such as the Consistency Reporting Tool Taks Force formed in 2023, that are intended to provide guidance to ensure that CMEP impacts are fully considered in technical analyses being undertaken by other technical committees and the ERO Enterprise more generally. 2) Participate in industry outreach as requested with ERO personnel on designated ERO topics. <ul style="list-style-type: none"> a) Strengthen partnerships with industry forums to work collaboratively toward consistent understanding of ERO Enterprise Programs and improvements to processes to strengthen reliability and security (NATF, NAGF, Regional Compliance Forums, Councils, Committees, etc.). 	CCC, Stakeholder Committees

Chapter 3: 2024 CCC Work Plan - Deliverables

Project Name	Activities/Deliverables	Resource	Date
CMEP and CCC Programs and Procedures	Review CCC procedures and update as needed per EROMS schedule. In 2024, the reviews included CCCPP-010, the CCC Charter, and EROMS and ORCS Scopes.	EROMS	Q4
	Review CCC Charter, EROMS and ORCS scopes, update as needed.	CCC, EROMS, ORCS	Q4
	Provide input to NERC Internal Audit, if requested.	CCC	Ongoing
Registration Input	Following anticipated FERC approval of the proposed changes to the NERC Rules of Procedure, ORCS will support NERC, through the ORCG with the NERC IBR Work Plans 2nd year efforts in identifying candidates for GO-IBR and/or GOP-IBR functional registration. ORCS may be requested to provide feedback and assistance during the identification activities.	ORCS	Q4
	Participate in CORES Functional Mapping project and provide feedback, as requested.	CCC, ORCS	Ongoing
Compliance Input	Review and comment on CMEP Practice Guides, as requested, and work with ERO staff on intended use across Res.	CCCEC	Ongoing
	Provide input on the Evidence Request Tool and RSAWs.	EROMS	Ongoing
Enterprise-wide Risk Collaboration	Provide updates regarding CCC activities, consistent with the EWRC mandate that calls for the EWRC to coordinate with the CCC with respect to the CCC's execution of its responsibilities under applicable FERC orders and the ROP. Share Annual Work Plan and key deliverables, provide findings of ERO Stakeholder Perceptions survey (Q2).	CCC Chair	Quarterly
	Support ERO risk assessment framework and provide input on residual risk evaluation as requested.	CCC	Ongoing
ERO Program Alignment	As requested by NERC, analyze issues and determine the scope and material impact.	CCC, NERC Staff	Ongoing
	Perform outreach on Consistency Reporting Tool.	Consistency Reporting Task Force (CRTTF) and NERC Staff	Q2
	Review CCCPP-008 Procedure to update reporting options.	EROMS	Q4

Project Name	Activities/Deliverables	Resource	Date
Support of ERO Program Effectiveness	Hold “focused discussions”, as outlined in CCCPP-008 (Program for Monitoring Stakeholders Perceptions), to solicit input from industry and the ERO Enterprise on objectives, content, and delivery of assessments of CMEP and ORCP effectiveness.	EROMS	Quarterly
	Support ERO development of any additional metrics to measure risk mitigation. (leverage CMEP biennial reports)	CCC	Ongoing
	Develop 2023 ERO Stakeholder Perception Feedback Report	EROMS	Q1
	Consistent with the SC/SCCG recommendations, support activities to implement recommendations from 2022 Standards Process Engagement Stakeholder Group (SPESG) proposal.	CCCEC	Ongoing
	Participate in and provide feedback to Align Users Group.	CCC Reps	Quarterly
Stakeholder Collaboration	Consistent with the SC/SCCG recommendations, collaborate with SCCG and ERO leadership to facilitate solutions, enhance program efficiency, effectiveness, and agility.	CCC	Quarterly
	Review new or upcoming SARs to help prioritize emerging issues, as needed and work with SCCG to help prioritize workload for the standards committee.	CCC Chair and Vice Chair	Ongoing

Chapter 4: Logistics and NERC Budget Requirements for CCC Activities

As part of the ongoing effort to improve effectiveness and efficiency, and to ensure that all CCC members can fully participate, for 2024, the CCC's first quarter meeting will be fully virtual, and the remaining meetings will have a hybrid option.

CCC Quarterly Meetings (Cost to be determined by NERC and industry)

Assumptions: Four CCC meetings per year, via WebEx or in-person.

- NERC staff attendance
- NERC travel expenses
- Hotel (Conference rooms if applicable – normally hosted at stakeholder locations or NERC offices)
- Food

CCC Program Audits/Review

In 2024, no audits are planned and no related expenses expected.

Webex/Conference Calls (Cost to be determined by NERC)

Assumptions: Conference calls, including CCC/Subcommittees NERC Webex or conference calls quarterly.

Training (Cost to be determined by NERC)

Assumptions: Half-day of hearing training appended to regular CCC meeting at least every three years.

CCC members should have the capability to assist with observation and creation of audit criteria to fulfill responsibilities under the CCC charter to conduct audits of NERC's adherence to the ROP. Learning programs are provided, to those new member participants, ahead of the audit activities and will be conducted as needed.

Chapter 5: Revision History

Revision History

Date	Version Number	Comments
November 21, 2023	1	CCC Executive Committee Review
December 7, 2023	2	CCC Review and Approval
February 15, 2024	2	Board Approval