

Meeting Minutes

Project Management and Oversight Subcommittee (PMOS)

June 26, 2019 | 8:00 a.m.–10:00 a.m. Eastern

Introduction and Chair's Remarks

Chair C. Yeung called the meeting, an in-person, to order at 8:00 a.m. Eastern. The meeting was announced via the PMOS email distribution list on June 19, 2019 as well as being publicly posted on the www.nerc.com website. The chair provided the subcommittee with opening remarks and welcomed members¹ and guests. The secretary took roll call for members and attendees during introductions. Those in attendance included:

Members: Charles Yeung (PMOS chair), Michael Brytowski (PMOS vice chair), Colby Bellville, Ken Lanehome, Mark Pratt, and Kirk Rosener in remote attendance. A quorum of voting members (i.e., six of nine) were present, in addition to non-voting member Amy Casuscelli.

Observers: from industry: Rachel Coyne (TRE), Kent Feliks (AEP), Venona Greaff (Oxy), Matthew Harward (SPP), Rebecca Moore Darrah (ACES), Quinn Morrison (Exelon), Kim Van Brimer (SPP), and Guy Zito (NPCC); from NERC: Scott Barfield-McGinnis (secretary), Marisa Hecht, and Soo Jin Kim.

NERC Antitrust Compliance Guidelines and Public Announcement

NERC Antitrust Compliance Guidelines and Public Announcement were presented and reviewed by the secretary. The secretary noted the full antitrust guidelines and public announcement were provided in the agenda package to each member via email and posted on the PMOS webpage. There were no questions.

NERC Participant Policy

The secretary noted that the revised NERC Participant Policy was included in the meeting announcement and for attendees to make themselves aware of its content.

Agenda Items

1. Review of Agenda

C. Yeung reviewed the agenda with members and attendees.

2. Consent Agenda

The May 15, 2019 Meeting Minutes were reviewed and the consent agenda was approved by unanimous consent.

¹ The PMOS is composed of industry stakeholders where the chair or vice chair must be a member of the Standards Committee (SC) and the SC leadership are non-voting members of the PMOS.

3. Review of Prior Action Items

S. Barfield-McGinnis reported on the following action items from the May 15, 2019 in-person meeting:

- a. Project 2015-09 obtain a new baseline schedule for acceptance at the June 2019 meeting (Complete)
- b. Obtain an update or new baseline for 2016-02d, Virtualization. (Complete)
- c. Consider 2018-03 for archiving on the June 2019 agenda. (Complete)
- d. For 2019-02 assign liaisons to distribution lists and update PTS. (Complete) Obtain baseline schedule once team is assembled. (In progress, tentative August)
- e. Develop initial complexity factors for review at the June 2019 in-person meeting. (Complete)
- f. Have S. Kim provide an update on how “on hold” projects will be restarted following Standards Efficiency Review (SER). (Complete)

4. Project Tracking Spreadsheet (PTS) and Project Review

- a. 2015-09 – Establish and Communicate System Operating Limits (SOL) – K. Lanehome reported:
 - i. The standard drafting team (SDT) is working on proposed language for FAC-011 Requirement R7, TOP-001 and IRO-008 this week. The team has received feedback on the logging/reporting time concept from FERC and NERC Standards staff and is working on data collection for SOL exceedances for analysis. This will help in finalizing a path forward.
 - ii. It has been decided that Interconnection Reliability Operating Limits (IROL) modifications will not be made to CIP-002 at this time. The CIP SDT (2016-02c) will finish their work and post with no changes to the IROL language. CIP-002 will be re-opened during phase 2 of this project to address the IROL language.
 - iii. A 45-day formal ballot is planned for late August 2019, with an additional one in mid-December and a final ballot in February 2020.
 - iv. The PMOS body was presented a revised baseline schedule to put the project back on a path given the new direction. A motion was made by K. Lanehome to accept the revised baseline for the new direction of the project. The motion was properly seconded and passed unanimously.
- b. 2016-02 – Modifications to Critical Infrastructure Protection (CIP) Standards – K. Lanehome reported the following:
 - i. (2016-02c) CIP-002-5.1a: A formal comment and ballot period was posted on June 3, 2019 with a July 17, 2019 end date. Assuming the industry approves, a final ballot will follow and this portion of the project will close out.
 - ii. (2016-02d) Version 5 TAG, Cyber Asset and BES Cyber Asset (BCA) definitions, Network and Externally Accessible Devices (ESP, ERC, and IRA), Virtualization, and CIP Exceptional Circumstances: The team has been focusing on updates to CIP-005 and definitions this week. The Virtualization and Future Technologies: Case for Change White Paper is posted for a 30-day informal comment period through June 28. CIP-005 and the definitions are being prepared for an informal comment period. The SDT will begin work on CIP-007 and

CIP-010 once CIP-005 and the definitions will be posted for comment by early August 2019. The first formal comment period is planned for November. A motion was made by K. Lanehome to accept the new baseline for this project. This is the first baseline for this project subpart as the team originally delayed virtualization to focus on the other parts of the CIP project. The motion was properly seconded and passed unanimously.

- iii. (2016-02e) – CIP-003-8 Malicious Code (FERC Order #843 Malicious Code Example Directive): The PMOS body moved to archive this part of the project since it was filed on May 21, 2019.
- c. 2017-01 – Project 2017-01 Modifications to BAL-003-1.1 – A. Casuscelli reported the following:
 - Phase I:** The week of June 17, 2019, the SDT focused first on the completion of Phase I. This phase is about one quarter behind the baseline schedule due to the development of the IFRO study.
 - Phase II:** At the in-person meeting the week of June 17, 2019, the SDT began drafting the proposed Standard changes for Phase II, and assimilate supporting documentation for an initial posting. The team is on schedule to post for an initial comment period and ballot in late August.
- d. 2017-03 – Periodic Review of FAC-008-3 Standard – No report as the project is on hold pending the outcome of the SER project.
- e. 2017-04 – Periodic Review of Interchange Scheduling and Coordination Standards – No report as the project is on hold pending the outcome of the SER project.
- f. 2017-05 – Project 2017-05 NUC-001-3 Periodic Review – No report as the project is on hold pending the outcome of the SER project.
- g. 2017-07 – Standards Alignment with Registration – No report as the project is on hold pending the outcome of the SER project.
- h. 2018-03 – Standards Efficiency Review (SER) Phase I – M. Pratt reported that NERC Legal petitioned regulatory authorities on June 7, 2019 with three separate filings as follows:
 - i. Notice of withdrawal for proposed Reliability Standard MOD-001-2 – Basis for withdrawal is because MOD-001-1a is among the Standards being proposed for retirement under Project 2018-03.
 - ii. Petition for approval of SER Retirements various (INT, FAC, PRC and MOD) Reliability Standards – Proposal for retirement of certain standards in their entirety.
 - iii. Petition for approval of Reliability Standard IRO-002-7, TOP-001-5 and VAR-001-6 – Proposal for partial retirements that will require versioning these standards.

The project status was set to “archived” now that it has been filed with regulatory authorities. A. Casuscelli gave an update on the SER Phase II work noting that the evidence retention concept seemed to have the highest level of interest.

- i. 2018-04 – Modifications to PRC-024-2 – L. Lynch reported that the initial ballot that closed on May 31, 2019 failed to pass at 52.25%. The SDT is still working towards posting a revised Standard for comment and ballot in late June following an action item on the Standards

Committee (SC) agenda for June 26, 2019. There have been five 2-hour conference calls to respond to industry comments since the initial ballot. Calls were followed by an in-person meeting June 18-20, 2019 at Hydro-Quebec's headquarters in Montreal, Quebec Canada. The secretary noted that the project baseline was never officially accepted during the March 20, 2019 meeting in Austin, Texas. A motion to officially accept the baseline schedule as presented was made by M. Brytowski, properly seconded and passed unanimously.

- j. 2019-01 – Modifications to TPL-007-3 – M. Brytowski reported that the drafting team met for two days, June 4-5, 2019 in Atlanta. The quality review was performed June 17-28, 2019 with a final SDT review scheduled for July 2. Concerns came up on how to address exceptions in the Corrective Action Plan (CAP) to address the FERC directive. This will most likely be an ERO (i.e., NERC) process. The SDT anticipates presenting the draft standard to the SC at their July 24, 2019 meeting for acceptance and approval to post for initial comment and ballot. The Commission in Order No. 851 directed NERC to develop and submit modifications to Reliability Standard TPL-007-2: (1) to require the development and implementation of corrective action plans to mitigate assessed supplemental GMD event vulnerabilities; and (2) to authorize extensions of time to implement corrective action plans on a case-by-case basis. In addition, the Commission accepts the revised GMD research work plan submitted by NERC.
- k. 2019-02 – BES Cyber System Information Access Management – Colby Bellville reported that the team met on June 16-17, 2019 and plans on presenting a revised draft Standard Authorization Request (SAR) to the SC at their July 24, 2019 meeting for acceptance along with a request to designate the SAR drafting team as the SDT.

5. Other

- a. Concerning the restarting of projects, S. Kim noted during the SER update that periodic review teams and the Standards Alignment project will need to review their work for conflicts given the SER retirements.

S. Kim updated the group on the FERC Docket No. RM19-10-000 relative to TPL-001-5 which indicates the Commission's intent to issue a directive to include Corrective Action Plans (CAPs) for protection system single points of failure in combination with three-phase faults if planning studies indicate potential cascading. NERC would most likely craft a new SAR to address the directive. Feedback would be obtained from the original SDT.

- b. M. Hecht reported that the following standards that have been filed, but not yet approved by FERC.
 - i. Petition for approval of Reliability Standard CIP-003-8 was filed May 21, 2019. The FERC comment period to become a party to proceeding closed June 12, 2019 and no parties intervened or protested. NERC is awaiting order.
 - ii. Petition for approval of Reliability Standard CIP-012-1 was filed September 18, 2018. A Notice of Proposed Rulemaking (NOPR) was issued on April 18, 2019, proposing to approve standard with two proposed directives. Public comments were due June 24, 2019 and NERC is currently awaiting an order.

- iii. Petition for approval of Reliability Standard TPL-001-5 was filed December 7, 2018. A NOPR was issued on June 20, 2019, proposing to approve standard with a proposed directive. Comments due 60 days after NOPR published in Federal Register
- iv. Three petitions for approval of Reliability Standards related to the SER project was filed June 7, 2019. (1) Docket RM19-17-000, standards include FAC-008-4, INT-006-5, INT-009-3, and PRC-004-6; (2) docket RM19-16-000, standards include IRO-002-7. Standard IRO-002-6 is still pending FERC action, but this petition requests retirement of that version (petition filed for approval on May 30, 2019 with WECC variance), TOP-001-5 VAR-001-6; (3) docket RM14-7-000 (Notice of withdrawal) included MOD-001-2 that was filed February 10, 2014. Currently awaiting FERC action.
- c. S. Barfield-McGinnis presented an initial proposal for incorporating complexity factors into the PTS. He provided an overview and plan for incorporating the factors into the PTS. The unused column "G" in the date schedule matrix of each project tab is planned to be used as the location for listing complexity factors. This area does not change and is consistent across all projects. Column "G" was originally designed for a similar concept but was not useful for understanding schedule slip. The proposed complexity factors will have weights that can calculate a revised completion date giving PMOS Liaison more insight into whether a certain schedule slip is reasonable based on weighting. The plan is to present a prototype to the PMOS body during the August 7 conference call and pending direction, implement by the September in-person meeting in Kansas City, Missouri.
- d. Next meeting – Conference call on August 7, 2019 at 1:00-3:00 p.m. Eastern.

6. Action Items

The secretary took the following action items to be addressed prior to the next meeting:

- a. Project 2016-02c, correct the Board delivery and filing date.
- b. Project 2016-02e, update the status to archive.
- c. Project 2018-03, update the status to archive and list the filing data in the PTS change control.
- d. Project 2018-04, update the second Comment and Ballot (CAB#2) following the outcome of the SC meeting on June 26, 2019.

7. Adjournment

C. Yeung adjourned the meeting at 9:45 a.m. Eastern by consent.