ERO Executive Spotlight – Sara Patrick, President and CEO, MRO

Working Together to Manage Significant Change

Last year, the ERO Enterprise underwent a significant change when the Southwest Power Pool Regional Entity (SPP RE) dissolved in July 2018 and its registered entities transferred to Midwest Reliability Organization (MRO) and SERC Reliability Corporation (SERC). The transition required considerable advanced planning and collaboration to ensure a seamless transition for our members. Here is how MRO approached this important evolution.

There was a considerable amount of change needed in a very short time frame to ensure the information, data and governance structure was in place to assume oversight responsibility for 100 new registered entities from the former SPP RE footprint. MRO’s bylaws and delegation agreement were revised, our workforce was expanded, our facility was remodeled to accommodate more staff, our leadership team was restructured and expanded, and our board, board committees and technical standing committees were reorganized to allow participation and leverage expertise from entities across the new footprint. As if that was not enough change, we also refreshed our logo and brand strategy to symbolize a fresh start and new beginning! Continued on page 2

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Working Together (cont’d)

A transition of this magnitude would not have been successful without the hard work and collaboration of many individuals across the ERO Enterprise. Together, we spent countless hours working to ensure a seamless experience for the entities affected and to maintain reliability of the bulk power system throughout the entire process. One of the key factors of our success was the significant amount of joint outreach conducted to communicate the many changes that took place during the transition. In MRO’s 2018 Annual Stakeholder Survey, 100 percent of respondents affected by the transition said they had the information necessary to prepare them for the integration to MRO. This speaks volumes about the amount of coordination that was taking place behind the scenes.

A similar transition is underway at SERC as it prepares to welcome registered entities from the Florida Reliability Coordinating Council (FRCC), which will cease its regional entity operations later this year. Having just gone through this process, MRO staff shared our experiences, lessons learned and feedback we had received from transitioning entities with SERC and FRCC staff early on. The continued collaboration, coordination and commitment to reliability will ensure that the ERO Enterprise manages this change successfully as well.

Our future is bright!

Sara Patrick is president and CEO of Midwest Reliability Organization

Headlines

NERC General Counsel Announces Plans to Retire in August; Replacement Search Begins

Charles (Charlie) Berardesco, senior vice president, general counsel and corporate secretary, announced plans to step down from his duties on August 31.

Berardesco joined NERC in July 2012, where he led Electric Reliability Organization efforts, including serving as interim chief executive officer during NERC’s CEO transition and elevating and enhancing NERC’s legal, enforcement and corporate governance functions.

“Charlie has done an outstanding job during his tenure at NERC,” said Roy Thilly, NERC Board of Trustees chair. “He was instrumental in leading NERC as interim CEO during our time of transition. Charlie’s expertise will be missed as he moves on to this next phase. We wish him the very best.”

Prior to joining NERC, Berardesco was senior vice president, general counsel, corporate secretary and chief compliance officer of Constellation Energy. In this role, he had primary responsibility for the company’s legal strategies and policies, including corporate governance, legal compliance and ethics, regulatory and corporate finance activities, mergers and acquisitions, and litigation.

Berardesco practiced law for nearly 20 years, serving as in-house counsel and with law firms prior to joining Constellation. He is active in numerous charitable and membership organizations, including service as board chair for the Gay Men’s Chorus of Washington, chair of the board of advisors of the Duke University Chapel, a member of the board of director of Chorus America, president of the University Club of Washington and a member of the advisory council of The George Washington University Law School. Berardesco also served as a member of the Business Council of the Human Rights Campaign.

“It has been an honor to work at NERC and with each of my colleagues whom I shall miss working with on a regular basis. I am proud of what we accomplished during the past nearly seven years,” Berardesco said. “I strongly support NERC’s important mission to address risks to the reliability and security of the grid, and I look forward to seeing more success from NERC in the years to come.”

“Charlie is a talented and distinctive attorney who has been a tremendous asset to NERC and the Electric Reliability Organization over his years of service,” said Jim Robb, president and CEO. “We wish him the absolute
best in his retirement and expect him to continue achieving great things.”

Sonia Mendonca will serve as interim general counsel and corporate secretary, working closely with Berardesco to ensure a seamless transition. NERC will work with its Board of Trustees and senior leadership to begin the talent search.

**Chief Financial, Administrative Officer Leaves NERC**

Scott Jones resigned as senior vice president, chief financial and administrative officer and treasurer, effective May 28. Jones joined NERC in December 2014.

“During his tenure, Scott elevated the caliber of our financial processes and procedures and brought a high level of expertise to our accounting and budgeting processes that will benefit NERC and our many stakeholders well into the future,” said Jim Robb, president and CEO. “In particular, he developed a top-notch financial team for us, and I thank Scott for his work during his almost five years at NERC and wish him well in the future.”

Andy Sharp, currently NERC controller, will lead finance functions as interim CFO with responsibility for oversight of business plans and budgets and day-to-day financial administration. NERC will work closely with its Board of Trustees and senior leadership to begin the talent search.

**Lawrence Speaks on DOE Cyber Conference Panel**

Bill Lawrence, vice president and director of NERC’s Electricity Information Sharing and Analysis Center, spoke on a panel at the Department of Energy’s (DOE) Cyber Conference in Denver on May 15. The conference, which took place May 13–16, focused on public and private sector collaboration to advance cyber and IT modernization efforts.

The panel — *Critical Infrastructure Public/Private Sector Information Sharing* — also featured Eóin Cooke, vice president of Security and Information Services at AltaLink, and Mike Wech, administrator and chief executive officer at the Southwestern Power Administration.

**Priority Placed on Efficiency, Effectiveness, Collaboration; NERC Appoints 2 New Vice Presidents**

NERC’s quarterly Board of Trustees meeting on May 9, focused on efforts to strengthen the ERO Enterprise model and the efficient, effective and collaborative work supporting reliability and security of the North American grid. Board Chair Roy Thilly opened the meeting and welcomed industry members and guests, including Bernard McNamee, commissioner, Federal Energy Regulatory Commission; Bruce Walker, assistant secretary for the Office of Electricity, Department of Energy; and David Morton, CAMPUT representative to NERC.

In his opening remarks, McNamee noted the importance of NERC’s role in assuring the reliability and fuel security of the bulk power system while working closely with FERC. He also stressed natural gas interdependency and security as vital issues for our continued focus. Walker agreed that gas interdependency is an important issue and one that DOE is looking at in the development of its North American resilience model, working with both FERC and NERC to complete this important task.

In his president’s report, NERC President and Chief Executive Officer Jim Robb noted that April marked the completion of his first year as CEO. He thanked industry, FERC, DOE and ERO Enterprise staff for their assistance in his seamless transition and highlighted the work being done across the ERO Enterprise to strengthen reliability and our partnerships.

“This year has been a real pivot point for the ERO Enterprise. We’ve had several leadership changes and have been able to focus our efforts on taking the model to the next level,” Robb said. “Although complex, the ERO model is brilliant and we — as the ERO Enterprise — are working hard to make it so. We are a collaborative organization with distinct roles between NERC and the Regional Entities. We recognize regional differences while striving to be consistent across the organization.”

Robb outlined four key areas that the ERO will focus on in the coming year:

- The E-ISAC Strategic Plan
- Priority areas including western Reliability Coordinator functions, inverters, supply chain, electromagnetic pulse (EMP) and CIP standards refinements
- ERO effectiveness and efficiency, including the Standards Efficiency Review, the new Align compliance tool implementation and stakeholder engagement and committee structure
- Business plans and budgets

“A highly reliable and secure grid is NERC’s continuous mission,” Robb said. “Assuring these priorities supports the complex fabric of our society. We, as the ERO Enterprise, are part of that fabric.”

The Board announced the appointment of two new vice presidents to NERC’s officer team: Howard Gugel, vice president and director, Engineering and Standards; and Mechelle Thomas, vice president and chief compliance officer. The Board noted that with FERC’s recent approval of FRCC RE dissolution, this meeting would be Stacy Dochoda’s last meeting as the CEO of FRCC RE and thanked her for her dedication and work for the ERO Enterprise — first at SPP RE and later at FRCC RE.

The Board approved the ERO Five-Year Performance Assessment (2014–2018), which is required by federal regulation. NERC’s last performance assessment was in 2014. The assessment addresses the ERO Enterprise’s activities and accomplishments, Regional Entity oversight and stakeholder comments. Activities and accomplishments highlighted in the assessment include:

- **E-ISAC**: Increased focus on information sharing and analysis to respond to threats, vulnerabilities and incidents that could affect the bulk power system
- **Reliability Standards**: Developed Reliability Standards to address cyber security, physical security and planning risks to the bulk power system
- **Compliance Monitoring and Enforcement Program**: Analyzed trends in the incidence of noncompliance; increased communications regarding dispositions of noncompliance; and launched procedural efficiencies, namely the Align tool, in coordination with the Regional Entities

The Board also accepted NERC’s Supply Chain Report, which provides an assessment of products/manufacturers used on the Bulk Electric System (BES). The report, based on a report commissioned by NERC from the Electric Power Research Institute (EPRI), provides an analysis of best practices and standards in other industries to mitigate supply chain risks. The report concludes that the supply chain standards should be modified to include electronic and physical access controls for medium and high-impact BES cyber systems.

The report also highlights the need for more data on low-impact BES cyber systems and outlines the need for guidelines, to be developed by the CIPC Supply Chain Working Group, on evaluating protected cyber assets and low-impact assets.

“This report provides recommended actions that NERC and industry can take to continue to address potential vulnerabilities that could be introduced in critical cyber assets that are used on the bulk power system,” Gugel said.

The Board received an update on NERC’s Standards Efficiency Review, which focuses on ensuring NERC Reliability Standards appropriately address risks to the bulk power system. Industry proposed retirements of requirements, through the ballot process, that were duplicative, administrative or otherwise unnecessary for reliability. The Board adopted the retirement of 84 requirements, which includes the revision of several standards, and the withdrawal of a standard pending regulatory approval. This project is scheduled to be completed by the end of 2019.

In other action, the Board adopted two standards. CIP-003-8 Cyber Security – Security Management Controls, which was developed in response to FERC Order No. 843, mitigates the risk of malicious code to low-impact BES cyber systems. IRO-002-6 – Reliability Coordination – Monitoring and Analysis adds a variance for the WECC Region to ensure coordination between Reliability
Coordinators within the Western Interconnection and requires those Reliability Coordinators to develop and use a common interconnection model for operations.

The Board also received an update on Reliability Coordinator activities in the Western Interconnection from Dave Godfrey, vice president of Reliability and Security Oversight at WECC. Godfrey highlighted the work done by NERC and WECC, including the new IRO-002-6 standard that requires interconnection-wide methodology for modeling and monitoring, to ensure seamless function across multiple Reliability Coordinators.

Other Reliability Coordinator transition activities include a Seams Summit in March; quarterly WECC Reliability Coordinator forums; the creation of the WECC Reliability Coordinator certification site; and industry transition coordination groups, which provide stakeholders the opportunity to discuss any Reliability Coordinator issues.

During the Member Representatives Committee meeting on May 8, NERC announced the launch of an EMP task force. The task force was created in response to EPRI’s recent EMP report, which provided technical insight, defined EMP threat, assessed vulnerabilities and risks and recommended mitigation actions. The task force, whose first meeting is scheduled for this month, will:

- Identify and address EMP reliability concerns;
- Perform a detailed review of the EPRI report;
- Identify key areas of concerns and improvement;
- Submit best practices and reliability guidelines, as needed; and
- Develop any needed Standards Authorization Requests.

Board presentations may be found by clicking here. The next Board of Trustees meeting is August 15 in Quebec.

**Compliance**

**Compliance Guidance Update**
A key factor in the success of compliance monitoring and enforcement of mandatory standards rests on a common understanding among industry and ERO Enterprise CMEP staff of how compliance can be achieved and demonstrated. For many standards, this is straightforward. For others, a variety of approaches may achieve the same objective. Implementation Guidance is developed by industry, for industry and requires ERO-Enterprise endorsement. This guidance provides examples for implementing a standard.

There is one new CMEP Practice Guide, BES Cyber System Information, posted on the Compliance Guidance page. The practice guide provides guidance to ERO Enterprise CMEP staff when assessing a registered entity’s process to authorize access to designated storage locations for BES Cyber System Information (BCSI) pursuant to CIP-004-6 Requirement R4 and any access controls the registered entity implemented as part of its CIP-011-2 Requirement R1 procedures.

This practice guide outlines aspects that CMEP staff should consider in understanding how a registered entity has applied access controls to mitigate the reliability risk associated with accessing BCSI. This risk information can be used to inform CMEP staff’s understanding of a registered entity’s security posture and commensurate compliance oversight (i.e., compliance oversight plan, audit approach, etc.). CMEP staff shall make compliance determinations based on individual registered entity specific facts and circumstances and the language of the requirements. This practice guide does not supersede or change any language contained in a standard.

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**Reliability Standard Audit Worksheets Posted**

Two Reliability Standard Audit Worksheets (RSAWs) are now available on the [RSAW page](#) of NERC’s website under the heading “Current RSAWs for Use.” RSAWs are guides provided by the ERO that describe types of evidence that registered entities may use to demonstrate compliance with a Reliability Standard. The worksheets, which include information regarding how the ERO may assess evidence, are drafted during the development of their corresponding Reliability Standards, which allows for enhanced transparency around compliance expectations.

**PER-003-2 – Operating Personnel Credentials** ensures that system operators performing the reliability-related tasks of the Reliability Coordinator, Balancing Authority and Transmission Operator are certified through the NERC System Operator Certification Program when filling a real-time operating position responsible for control of the Bulk Electric System. PER-003-2 applies to Balancing Authorities, Reliability Coordinators and Transmission Operators. The standard becomes effective July 1, 2019.

**TPL-007-3 – Transmission System Planned Performance for Geomagnetic Disturbance Events** establishes requirements for transmission system planned performance during geomagnetic disturbance events. TPL-007-3 adds a variance for Canadian entities and applies to Generator Owners, Planning Coordinators, Transmission Owners and Transmission Planners. It becomes effective July 1, 2019. Under the terms of the TPL-007-3 implementation plan, TPL-007-3 will supersede TPL-007-2 in the United States. All phased-in compliance dates are carried forward unchanged.

**Update on the Centralized Organization Registration ERO System Technology Project**

The [Centralized Organization Registration ERO System (CORES)](#) Technology Project is progressing according to plan and is scheduled to launch between June 17 and June 28, 2019. CORES, which combines the registration functions currently managed in OATI – webCDMS, Guidance – CITS and CRATS into a consolidated registration system, will streamline the processing of registration requests, create a central repository for registered entity data and provide a way for entities to manage Joint Registration Organizations, Coordinated Functional Registrations and other registration needs.

In May, the ERO hosted four CORES registered entity pilot sessions. The sessions provided registered entities a sneak peak of the new software and a chance to assist with some preliminary testing and ask questions regarding CORES. Approximately 50 registered entities participated in the sessions, which contained a good mix of functional registration participants, including individuals from all seven Regions, Canada and the United States. Their input was very valuable in the continuing development of CORES and planning for greater industry outreach.

Additional information regarding upcoming training will be released soon. If you would like more information about the project, please contact [Ryan Stewart](#), NERC’s senior manager of Registration and Certification.

**Resources Posted**

NERC posted the [slide presentation](#) and [webinar recording](#) for the April 30, 2019 Violations Themes webinar.

**Reliability Risk Management**

**Lessons Learned Posted**

NERC published three new Lessons Learned under the [Event Analysis – Lessons Learned](#) tab on NERC.com.

The [Automatic Capacitor Operations along Radial Feed Result in Load Shed](#) Lessons Learned examines an incident in which an unplanned 138 kV bus outage created a radial load pocket without voltage or thermal violations. Shortly after, automatic switching involving two capacitor banks resulted in low voltages below emergency levels. The Reliability Coordinator directed the Transmission Operator to shed approximately 30 MW of load to restore voltages to acceptable levels. This Lessons Learned is of primary interest to Reliability Coordinators, Transmission Operators and Transmission Owners.

The [Enhanced Alarming Can Help Detect State Estimator and Real-Time Contingency Analysis Issue](#) Lessons
Learned examines why several entities in the ReliabilityFirst Region have experienced state estimator or real-time contingency analysis outages that could have been mitigated more quickly with better alarming. This Lessons Learned is of primary interest to Reliability Coordinators, Transmission Operators and Transmission Owners who operate a state estimator.

The Telecom Provider Failure Induced Loss of ICCP from Regional Neighbors Lessons Learned examines an incident in which a registered Reliability Coordinator experienced a temporary loss of inter-control center communications protocol data feeds from their regional neighbors. This loss of connectivity was due to third-party telecommunications vendor equipment that experienced a malfunction. For the next nine hours, these data links were intermittently unavailable. There was no adverse effect on the Bulk Electric System. This Lessons Learned is of primary interest to Reliability Coordinators, Balancing Authorities, Transmission Operators and Transmission Owners.

A successful Lessons Learned document clearly identifies the lesson, contains sufficient information to understand the issues, visibly identifies the difference between the actual outcome and the desired outcome and includes an accurate sequence of events, when it provides clarity.

Standards

Resources Posted
NERC posted the slide presentation and streaming webinar for the April 18, 2019 Project 2018-04 – Modifications to PRC-024-2 webinar.

NERC also posted the slide presentation and streaming webinar for the April 24, 2019 Project 2016-02 – Modifications to CIP Standards Virtualization and Future Technologies: Case for Change webinar.

2019 Registered Ballot Body Self-Select Attestation Process Coming Soon
Appendix 3D Registered Ballot Body (RBB) Criteria of the NERC Rules of Procedure states:

“Each participant, when initially registering to join the Registered Ballot Body, and annually thereafter, shall self-select to belong to one of the Segments…”

Therefore, NERC Standards staff will be initiating the 2019 annual RBB self-select process in the coming weeks.

- **June 2019** – Each RBB voting member will receive a notification with a link to the Standards Balloting and Commenting System (SBS) electronic attestation page to confirm that there have been no material changes in the last 12 months that affect the member’s current Segment selection(s), and the member continues to meet the Segment qualifications (as outlined in the qualifications in Appendix 3D: RBB Criteria referenced above).

- **August 2019** – Deadline for all RBB members to self-select their Segments via the SBS.

Notifications regarding the process will be sent via SBS/RBB email, Standards Committee communications, the Standards, Compliance, and Enforcement Bulletin and other NERC email alerts. Specific dates to be determined soon.

CIP-002-6 Ballot
A version of CIP-002-6, which included modifications to criteria 2.6 and 2.9 based on the work of the Project 2015-09 – Establish and Communicate System Operating Limits standard drafting team, was posted for ballot from September 28, 2018 through October 9, 2018. The Project 2016-02 – Modifications to CIP Standards and Project 2015-09 standard drafting teams determined that these revisions are no longer needed. As a result, CIP-002-6 is now posted for an additional comment and ballot period without the revisions to criteria 2.6 and 2.9. NERC reopened the ballot pool to accommodate changes in the ballot body.

Supply Chain Risk Report Available
In 2017, NERC developed new and revised critical infrastructure protection (CIP) Reliability Standards to help mitigate cyber security risks associated with the
supply chain for high- and medium-impact BES Cyber Systems. Consistent with the risk-based framework of the NERC CIP Reliability Standards, the supply chain standards will be applicable to the highest-risk systems that have the greatest impact to the grid. They will require entities that possess high- and medium-impact BES Cyber Systems to develop processes to ensure responsible entities manage supply chain risks to those systems through the procurement process, thereby reducing the risk that supply chain compromise will negatively impact the bulk power system.

When the NERC Board of Trustees adopted the standards in August 2017, they directed NERC to study the nature and complexity of cyber security supply chain risks, including those associated with low-impact assets not currently subject to the standards and develop recommendations for follow-up actions that will best address identified risks.

NERC posted the final *Cyber Security Supply Chain Risks* report as well as the redlined version with policy input to the Supply Chain Risk Mitigation Program page on the NERC website. In this report, NERC documents the results of the evaluation of supply chain risks associated with certain categories of assets not currently subject to the supply chain standards and recommends actions to address those risks.

**Regional Entity Events**

### Midwest Reliability Organization (MRO)
- Security Advisory Council Meeting, June 19 | Details
- Organizational Group Oversight Committee Meeting, June 19 | Details
- MRO Board of Directors Meeting, June 20 | Details
- Reliability Advisory Council Meeting, August 7 | Details
- CMEP Advisory Meeting Council, September 18 | Details
- Organizational Group Oversight Committee Meeting, September 18 | Details
- MRO Board of Directors Meeting, September 19 | Details

### Northeast Power Coordinating Council (NPCC)
- 2019 Fall Compliance and Standards Workshop, November 20–21, Newport, R.I. | Details Coming Soon

### ReliabilityFirst (RF)
- Short Circuit Data Modeling Workshop, June 5, Independence, Ohio | Details
- Reliability and Compliance Open Forum Call Conference Call, June 17 | Details
- Reliability and Compliance Open Forum Call Conference Call, July 15 | Details
- 2019 Protection System Workshop, August 13–14, Independence, Ohio | Details
- 2019 Human Performance Workshop, August 14, Independence, Ohio | Details
- Reliability and Compliance Open Forum Call Conference Call, August 19 | Details
- Reliability and Compliance Open Forum Call Conference Call, September 16 | Details
- 2019 Fall Reliability and CIP Workshop, October 1, Cleveland, Ohio | Details
- Reliability and Compliance Open Forum Call Conference Call, October 21 | Details

### SERC Reliability Corporation
- SERC Portals and Technical Committees Webinar #1, June 12 | Details
- SERC Portals and Technical Committees Webinar #2, June 19 | Details
- Open Forum Webinar, July 29 | Details
- Align Training for Regional Entity Staff, August 6 | Details
- Registered Entity Align Tool Training #1, August 13 | Details
- Registered Entity Align Tool Training #2, August 20 | Details
- System Operator Conference, August 27–29 | Details
- CIP Compliance Seminar, September 17–18 | Details
• **System Operator Conference**, September 24—26 | Details
• **Fall Compliance Seminar**, October 8—9 | Details

**Texas RE**
• **Talk with Texas RE**, June 20 | Register
• **Compliance 101 Workshop**, July 25 | Details

**WECC**
• **Board of Directors and Associated Meetings**, June 18–19 | Salt Lake City, Utah | Details

## Upcoming Events

For a full accounting of NERC events, such as meetings and conference calls for standard drafting teams, other standing committees, subcommittees, task forces, and working groups, please refer to the [NERC calendar](#).

• **Compliance and Certification Committee Meeting** – June 18–19, Chicago | Register
• **Standards Committee Meeting** – 10:00 a.m.–3:00 p.m. Eastern, June 26 | Register
• **2019 Industry Standards and Compliance Workshop** – July 23–24, 2019, Minneapolis, Minn. | In-person Registration | Webinar Registration | Hotel Registration

## Filings

### NERC Filings to FERC

**May 15, 2019**

*Compliance Filing In Response to January 16 Order* | NERC submits an unaudited report of NERC’s budget-to-actual variance information for the first quarter 2019. This compliance filing is in accordance with FERC’s January 16, 2013 Order, which approved a settlement agreement between the FERC Office of Enforcement and NERC, related to findings and recommendations arising out of its 2012 performance audit.

**May 21, 2019**

*Petition of NERC for Approval of Proposed Reliability Standard CIP-003-8* | NERC submits a petition for the approval of proposed Reliability Standard CIP-003-8—Cyber Security - Security Management Controls. The proposed Reliability Standard addresses FERC’s directive from Order No. 843 to develop modifications to mitigate the risk of malicious code that could result from third-party transient electronic devices for low-impact BES Cyber Systems.

**May 28, 2019**

*Supply Chain Report Filing* | NERC submits the report titled, *Cyber Security Supply Chain Risks: Staff Report and Recommended Actions*. NERC submits this report to FERC in accordance with the Commission’s directive in paragraph 31 of Order No. 850.

**May 30, 2019**

*Joint Petition of NERC and WECC for Approval of Proposed Reliability Standard IRO-002-6* | NERC and WECC submit a joint petition for the approval of proposed Reliability Standard IRO-002-6. Proposed Reliability Standard IRO-002-6 reflects the addition of a regional Variance containing additional requirements applicable to Reliability Coordinators providing service to entities in the Western Interconnection.

### NERC Filings in Canada

**May 29, 2019**

*Notice of Filing of the North American Electric Reliability Corporation of Proposed Reliability Standard CIP-003-8 (Alberta)* | Attachments to CIP-003-8 Filing

## Careers at NERC

**Cyber Analyst – Network Analyst**
Location: Washington, DC | Details

**E-ISAC Watch Officer – Open Source Intelligence**
Location: Washington, DC | Details