

Meeting Notes

Project 2022-05 Modifications to CIP-008

Reporting Threshold

SAR Drafting Team

April 3 and 12, 2023

Review NERC Antitrust Compliance Guidelines and Public Announcement

Alison Oswald, NERC staff, called attention to the NERC Antitrust Compliance Guidelines and the public meeting notice.

Roll Call and Determination of Quorum

A team roll call was taken and quorum was determined on both days. The member attendance sheet is attached as attachment 1.

Comment Review

The team began review of the comments and themes. There is a large amount of comments from industry that do not support the SAR or the changes recommended in the SAR. Barry Kuehnle, FERC staff, stated that from his perspective, an increase in the number of reports is not the end goal. He stated that he has been on some audits where the definition the entity has created for attempts to compromise are written in a way to not capture any attempt. In his opinion, those definitions did not live up to what the audit team felt was appropriate. As an example, some of the entities had similar attempts like solar winds that were not defined as attempts for other entities.

SAR Revisions

Sharon Koller asked how the team can move this SAR forward if it has not received a lot of industry support. Michaelson Buchanan, NERC staff, stated that the CIP-008 study was done through the CCTF and they found deficiencies in the definition of attempts to compromise. Sharon states there seems to be a lack of alignment between industry and regulators on what is attempts to compromise. If the drafting team could come to an agreement to have minimum expectation to improve the definition, then perhaps the two groups could become more aligned. Michelle Ross said the team could work to find a sweet spot to provide clarification without over complicating it. Darrell Grumman is also in support of minimums. Josh Rowe suggested the team could look at EOP-004 as an example of a matrix minimum. The team also discussed an idea to change guidance and not standard language. Marisa Hecht, NERC Legal, and Lonnie Ratliff, NERC Compliance, both stated guidance is not enforceable and cannot change what is required in the standard. Based on this discussion, the team reviewed the SAR again, and made a new more clarifying change. The team then voted to approve the SAR to go back to the Standards Committee (SC) at the May SC meeting. The results of the vote are included in attachment 1.

The team discussed having more calls before the May SC meeting. The purpose of these calls will be to discuss CIP-008 programs and definitions that team members are familiar with as background research prior to working on standard language. The team scheduled a call for April 27 and meeting invites will be sent out to the plus list.

Attachment 1

Name	Entity	4/3	4/12	SAR to Move Forward
Tony Hall	LG&E and KU Energy	X	X	Yes
Sharon Koller	American Transmission Company, LLC	X	X	Yes
Darrel A. Grumman	Electric Power Engineers	X	X	Yes
Marc Child	Great River Energy	N	X	No
Bryan Yoch	Ameren	X	X	Yes
Joshua Rowe	WECC	N	X	Yes
Brent Howell	Duke Energy	X	N	-
Michelle Ross	Exelon	X	X	Yes
Scott Klauminzer	Tacoma Public Utilities	X	N	-
Lawrence Good	Bonneville Power Administration	N	N	-