

Meeting Notes

Project 2022-05 Modifications to CIP-008

Reporting Threshold

SAR Drafting Team

May 22, 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. The member attendance sheet is attached as attachment 1.

Review Standards Committee Meeting Results

Alison Oswald notified the drafting team that the Standards Committee, at their May CC meeting, has directed the SAR drafting team to write a summary response to comments received on the SAR. Sharon Koller asked why the SC has requested this of the SAR DT. Tony Hall stated it is to explain the SAR DT's position on moving the SAR forward given the comments received on the SAR were not fully in support of the stated purpose of the project. Maggie Steiner, FERC, asked when the target for completion of the summary response would be. Alison Oswald stated the target would be July, and going back to the SC meeting in that month to ask for authorization to work on the standard again at that time.

Sharon Koller asked if NERC and FERC have considered a CMEP practice guide as a solution to the purpose laid out in the SAR. Lonnie Ratliff, NERC Compliance, stated a practice guide would not be a good solution because it would not be enforceable, and that he has concerns if this project does not move forward into standard/definition revisions. This is an issue that compliance has been monitoring for years. FERC staff stated they feel the same and agree with the study findings that lead to the creation of this SAR. Lonnie further stated that audits have found entities use the flexibility in the standard to write themselves out of reporting under the standard by using "intent" which is challenging to prove.

The team then discussed the comments received on the SAR further to prepare for writing a response to comments.

Attachment 1

Name	Entity	5/22
Tony Hall	LG&E and KU Energy	X
Sharon Koller	American Transmission Company, LLC	X
Darrel A. Grumman	Electric Power Engineers	X
Marc Child	Great River Energy	X
Bryan Yoch	Ameren	X
Joshua Rowe	WECC	X
Brent Howell	Duke Energy	N
Michelle Ross	Exelon	X
Scott Klauminzer	Tacoma Public Utilities	X
Lawrence Good	Bonneville Power Administration	X