

Compliance Application Notices, Process Bulletins, and Directives

Document List and Future Actions - PUBLIC

A key factor in the success of compliance monitoring and enforcement of mandatory standards is a common understanding between industry and Electric Reliability Organization (ERO) Enterprise Compliance Monitoring and Enforcement Program (CMEP) staff on how compliance can be achieved and demonstrated. Some standards are written deliberately to enable a variety of approaches to compliance, as the nature of the desired end-state does not lend itself to a clear-cut solution given the range of system configurations and potential responses to achieving the reliability goal.

With the addition of more results-based standards, which inherently allow for greater flexibility by entities in responding to standards and requirements, the ERO issued a number of supplementary documents over time to address compliance uncertainty, including Compliance Process Bulletins, Compliance Application Notices (CANs) and Compliance Analysis Reports (CARs), and Compliance Directives.

To support successful implementation of and compliance with the NERC Reliability Standards, the ERO Enterprise adopted the Compliance Guidance Policy in 2015.¹ The policy included the creation of CMEP Practice Guides, which are developed solely by the ERO Enterprise to reflect the independent, objective professional judgment of ERO Enterprise CMEP staff, and may at times be initiated following policy discussions with industry stakeholders. Following development, the Guides are posted for transparency on the NERC website. CMEP Practice Guides provide the following:

- direction to ERO Enterprise CMEP staff on approaches to carry out compliance and enforcement activities (including discretion to be applied, auditing practices, risk assessment techniques, policies to be implemented, and particular areas of focus for CMEP activities), and to foster consistency in compliance and enforcement;
- a uniform approach used by ERO Enterprise CMEP staff; and
- transparency to registered entities by being publicly posted.

The ERO Enterprise has reviewed the existing legacy guidance documentation to determine whether it is still relevant or should be retired. The notices, bulletins, and directives recommended for retirement—as they no longer apply to the effective Reliability Standards, are outdated, or are covered under NERC’s Rules of Procedure (RoP)—are listed in Tables 1 through 3. The remaining documents (also listed in Tables 1 through 3) will be reviewed and converted into CMEP Practice Guides, or included in other procedural material such as the CMEP Implementation Plan, NERC’s RoP, etc. by NERC staff in coordination with the Compliance and Certification Committee.

¹ [Compliance Guidance Policy](#)

Table 1: Compliance Application Notices

Title	Date Issued/ Last Revised	Action	Rationale
CAN-0005 CIP-002 R3 Critical Cyber Asset Designation for System Operator Laptops	09-09-2011	Retire and Archive	Reliability Standard no longer in effect.
CAN-0007 CIP-004 R4.2 Revocation of Access to Critical Cyber Assets (CCAs)	09-09-2011	Retire and Archive	Reliability Standard no longer in effect.
CAN-0017 CIP-007 R5 Technical and Procedural System Access and Password Controls	10-11-2011	Retire and Archive	Reliability Standard no longer in effect.
CAN-0031 CIP-006 R1 Acceptable Opening Dimensions	12-09-2011	Retire and Archive	Reliability Standard no longer in effect.
Outstanding Compliance Application Notices Under Review Requiring Future Action(s):			
CAN-0010 Implementation of “Annual” in Reliability Standards Requirements			
CAN-0012 Completion of Periodic Activity Requirements During Implementation Plan			
CAN-0030 Attestations			

Table 2: Compliance Process Bulletins

Title	Date Issued/ Last Revised	Proposed Action	Rationale
#2009-003 Pro Forma Settlement Process for Documentary Requirements Version 1.0 (Retired and Replaced by Version 2.0)	06-2-2009	Archive	Superseded by a newer version. Version 1.0 was effectively retired when replaced by Version 2.0 on 06- 29-2009.
#2009-003 Pro Forma Settlement Process for Documentary Requirements Version 2.0	06-29-2009	Retire and Archive	Addressed in NERC's RoP.
#2009-004 Providing Access to and Copies of Evidence to Regional Entity, NERC, and FERC Staff Version 1.0 (Retired and Replaced by Version 2.0)	06-29-2009	Archive	Superseded by a newer version. Version 1.0 was effectively retired when replaced by Version 2.0 on 07- 15-2009.
#2009-004 Providing Access to and Copies of Evidence to Regional Entity, NERC, and FERC Staff Version 2.0	07-15-2009	Retire and Archive	Addressed in NERC's RoP.
#2009-005 Current In-Force Document Data Retention Requirements for Registered Entities Version 1.0	06-29-2009	Retire and Archive	Addressed in newer version of Compliance Process Bulletin.
#2009-006 Interim Approach to Technical Feasibility Exceptions	07-01-2009	Retire and Archive	Reliability Standard's Transition period has expired.
#2009-007 Amended Interim Approach to Technical Feasibility Exceptions Version 1.0 (Retired and Replaced by Version 1.1)	10-12-2009	Archive	Superseded by a newer version. Version 1.0 was effectively retired when replaced by Version 1.1 on 10- 13-2009.
#2009-007 Amended Interim Approach to Technical Feasibility Exceptions Version 1.1 (Retired and Replaced by Version 1.2)	10-13-2009	Archive	Superseded by a newer version. Version 1.1 was effectively retired when replaced by Version 1.2 on 11- 09-2009.
#2009-007 Amended Interim Approach to Technical Feasibility Exceptions Version 1.2	11-09-2009	Retire and Archive	Reliability Standard no longer in effect.

Table 2: Compliance Process Bulletins

Title	Date Issued/ Last Revised	Proposed Action	Rationale
#2009-008 Newly Identified Critical Assets and Critical Cyber Assets	12-18-2009	Retire and Archive	Reliability Standard no longer in effect.
#2010-001 Update to Interim TFE Program	01-27-2010	Retire and Archive	Reliability Standard's Transition period has expired.
#2010-002 Update to 2010 CMEP Implementation Plan	02-12-2010	Retire and Archive	Outdated – No longer applicable.
#2010-002 CIP Self-Certification Addendum	12-09-2010	Retire and Archive	Reliability Standard no longer in effect.
#2011-002 Timing of Audit Notifications	06-17-2011	Retire and Archive	Outlined in NERC's RoP.
#2011-004 Rated System Path Methodology – Compliance Extension Request	07-18-2011	Retire and Archive	Reliability Standard no longer in effect.
#2011-006 CIP Implementation Plan Table 3 Entities	10-19-2011	Retire and Archive	Reliability Standard no longer in effect.
#2011-007 Zero-Dollar Penalties	12-09-2011	Retire and Archive	Outdated – No longer applicable.
Outstanding Compliance Process Bulletins Under Review Requiring Future Action(s):			
#2008-001 Vegetation-related Transmission Outage Reporting			
#2010-004 Guidance for Entities that Delegate Reliability Tasks to a Third Party Entity			
#2011-001 Data Retention Requirements			
#2011-003 MOD-001-1a, MOD-004-1, and MOD-008-1			
#2011-005 Transfer of Assets and Deployment of New Assets			

Table 3: Compliance Directives

Title	Date Issued/ Last Revised	Proposed Action	Rationale
#2008-RTA-007 Registered Entity Submission of Violation Statements	08-09-2010	Retire and Archive	Outdated – No longer applicable.
#2008-RTA-008 NERC Requirements — Electronically- Submitted CMEP Materials	08-09-2010	Retire and Archive	Outdated – No longer applicable.
#2009-CAG-001 Regional Self-Certifications (Rescinded on March 31, 2010)	04-19-2010	Archive	This directive was effectively retired when it was rescinded on March 31, 2010.
#2009-CAG-002 Compliance Audit Certification Letter	05-19-2010	Retire and Archive	Outdated – No longer applicable.
#2009-CAG-003 Regional Compliance Auditor Training Requirements	07-06-2010	Retire and Archive	Outdated – No longer applicable.
Outstanding Compliance Directives Under Review Requiring Future Action(s):			
#2009-CAG-004 Extension of Self-Certification Deadlines			