

# Standards, Compliance, and Enforcement Bulletin

September 30–October 6, 2019

## INSIDE THIS EDITION

[Active Standards Postings](#) | [Other Active Comment Periods](#) | [Standards News](#) | [General Compliance and Enforcement News](#) | [Standards Subject to Future Enforcement](#) | [Board of Trustees and FERC Action](#) | [Upcoming Events](#) | [About the SC&E Bulletin](#)

## ACTIVE STANDARDS POSTINGS

### Current and Upcoming Ballots (ballot periods close at 8:00 p.m. Eastern)

Project	Action	Start Date	End Date
<a href="#">Project 2018-04 – Modifications to PRC-024-2</a>   PRC-024-3 (Draft 2)	<a href="#">Additional Ballot and Non-Binding Poll</a>	10/25/19	11/04/19

Project	Action	Start Date	End Date
--	--	--	--

### Posted for Comment

Project	Action	Start Date	End Date
<a href="#">Project 2018-04 – Modifications to PRC-024-2</a>   PRC-024-3 (Draft 2)	<a href="#">Comment Period</a>	09/20/19	11/04/29

**OTHER ACTIVE COMMENT PERIODS**

Posted for Comment			
Posting	Action	Start Date	End Date
<p><b>Comment Period Open for Electromagnetic Pulses Task Force Strategic Recommendations Report:</b> Protecting the bulk power system and assuring the effective reduction of risks to reliability are integral pieces of the Electric Reliability Organization mission. NERC has launched efforts to identify reliability concerns associated with electromagnetic pulses (EMPs) and potential methods for promoting resilience. A task force was created in April 2019 to first identify key issues and scope areas of improvement for the industry. EMP events may pose a risk to the reliability of the bulk power system. In order to better understand and address these potential risks, the EMP Task Force has formulated a catalogue of strategic recommendations and policy matters and is seeking industry comment on the draft strategic report. Contact <a href="#">Wendy Muller</a> regarding issues with the electronic form. An unofficial Word version of the comment form and additional information can be found on the <a href="#">EMP Task Force page</a>.</p>	<p>Use the <a href="#">electronic form</a> to submit comments.</p>	08/30/19	09/30/19
<p><b>Comment Period Open for Revised ERO Enterprise Long-Term Strategy:</b> The <i>ERO Enterprise Long-Term Strategy</i>, last approved by the NERC Board of Trustees on November 9, 2017, consists of strategic focus areas that are reviewed on a periodic basis to identify any needed adjustments. ERO Enterprise leadership has recently reviewed and revised the long-term strategy as part of an effort to streamline the ERO Enterprise’s strategic and operational documents and ensure alignment with the Reliability Issues Steering Committee’s currently identified risks to the bulk power system. The revised draft is now available for stakeholder review and comment on NERC’s website.</p>	<p>Submit all comments by email to <a href="#">Erika Chanzas</a>.</p>	09/10/19	10/01/19

<p><b>Comment Period Open for First Draft of the ERO Reliability Risk Priorities Report:</b> The Reliability Issues Steering Committee (RISC) is an advisory committee to the NERC Board of Trustees (Board) that provides key insights, priorities, and high-level leadership for issues of strategic importance to bulk power system reliability. The RISC develops the <i>ERO Reliability Risk Priorities Report</i> to present the results of its continued work to strategically define and prioritize risks to the reliable operation of the bulk power system and thereby provide recommendations to the Board regarding the approach that NERC and the ERO Enterprise should take to enhance reliability and manage those risks.</p> <p>The <a href="#">first draft of the report</a> is posted on NERC’s website for stakeholder comment. Nelson Peeler, chair of the RISC, will present the final report, taking stakeholder comments into consideration, at the November 5, 2019 Board of Trustees meeting.</p>	<p>Submit all comments by email to <a href="#">Tina Buzzard</a>.</p>	<p>09/13/19</p>	<p>10/04/19</p>
--	--	-----------------	-----------------

## STANDARDS NEWS

### NEW Webinar Resources Posted

NERC has posted the [streaming webinar](#) and [slide presentation](#) from the September 23, 2019 Supply Chain Risk Assessment Data Request webinar.

### Supply Chain Risk Assessment Data Request

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 Bulk Electric System (BES) Cyber Systems. These standards, collectively referred to as Supply Chain Standards, consist of new Reliability Standard CIP-013-1 and revised Reliability Standards CIP-010-3 and CIP-005-6. When adopting the Supply Chain Standards in August 2017, the NERC Board directed NERC to undertake further action on supply chain issues. Among other things, the Board directed NERC to study the nature and complexity of cyber security supply chain risks, including those

### Quick Links

- [Register in the SBS](#)
- [Projected Standards Posting Schedule](#)
- [Project Tracking Spreadsheet](#)
- [2019–2021 Reliability Standards Development Plan](#)
- [Quality Review Application](#)
- [One-Stop Shop \(Status, Purpose, Implementation Plans, FERC Orders, RSAWs\)](#)
- [CIP Standards Efficiency Review](#)

associated with low-impact assets not currently subject to the Supply Chain Standards, and develop recommendations for follow-up actions that will best address identified risks.

In its final report accepted by the NERC Board in May 2019, NERC documented the results of the evaluation of supply chain risks associated with certain categories of assets not currently subject to the Supply Chain Standards and recommended actions to address those risks. NERC staff recommended further study to determine whether new information supports modifying the standards to include low-impact BES Cyber Systems with external routable connectivity by issuing a Request for Data or Information pursuant to Section 1600 of the NERC Rules of Procedure. NERC staff worked with the Critical Infrastructure Protection Committee (CIPC) Supply Chain Working Group (SCWG) to develop the questions in this data request.

Use the [electronic form](#) to submit [NERC Rules of Procedure Section 1600 Data Request for Supply Chain Risk Assessment](#) data by **October 3, 2019**. Contact [Wendy Muller](#) regarding issues accessing or using the electronic form.

### **Nomination Period Open for Standards Committee**

Registered Ballot Body (RBB) members and others interested in NERC Reliability Standards are encouraged to submit nominations for industry segment representatives on the Standards Committee (SC). Reliability Standards are mandatory for all bulk power system owners, operators, and users in North America, and the SC's oversight role is therefore increasingly important. The SC consists of two members from each of the ten Industry Segments that make up the RBB. In addition, [Appendix 3B](#) of the Rules of Procedure contains special provisions to be used to achieve a balance of representation between the United States and Canada. The SC is elected by industry stakeholders and reports directly to the NERC Board of Trustees. The SC meets up to 12 times each year, with four face-to-face meetings and the remainder by conference call. SC members who cannot travel to the meetings may participate by conference call. The [Standards Committee Charter](#) provides a description of the SC's responsibilities.

There are members representing ten segments whose terms will conclude at the end of December 2019. Therefore, an election will be held to fill the two-year terms (2020–2021) for each of the ten segments. When submitting a [nomination form](#), indicate the segment you are interested in for membership. Please see the table below for concluding membership terms.

Membership Terms Concluding			
Segment	Representative	Title	Organization
1	Sean Cavote	Manager, NERC Compliance and Advocacy	Public Service Enterprise Group
2	Michael Puscas	Compliance Manager, Reliability and Operations Compliance	ISO New England, Inc.
3	Todd Bennett	Manager, Reliability Compliance	Associated Electric Cooperative, Inc.
4	Chris Gowder	Regulatory Compliance Manager	Florida Municipal Power Agency
5	Yee Chou	Director, NERC Compliance Services	American Electric Power
6	Jennifer Flandermeyer	Director, Federal Regulatory Policy	Evergy
7	Frank McElvain	Senior Manager, Consulting	Siemens Power Technologies International
8	Robert Blohm	Managing Director	Keen Resources Ltd.
9	Alexander Vedvik	Senior Electrical Engineer	Public Service Commission of Wisconsin
10	Guy Zito	Assistant Vice President, Standards	Northeast Power Coordinating Council

Any Industry Segment that intends to use a special procedure to elect its SC representatives must provide a copy of its procedure to [Linda Jenkins](#) by October 10, 2019.

Anyone may submit a nomination. To be eligible for nomination, a nominee shall be an employee or agent of an entity belonging in the applicable Segment. To allow verification of affiliation, a nominee must be a registered user in the NERC [RBB](#). It is not required that the nominee be the same person as the entity's RBB representative for

the applicable Segment. Instructions are provided in [Appendix 3B](#) of the NERC Rules of Procedure – *Procedure for Election of Members of the NERC Standards Committee Procedure*. Please submit completed SC [nomination forms](#) to [Linda Jenkins](#) no later than **Thursday, October 10, 2019**. An election of segment representatives will be conducted shortly after the nomination period is closed.

## GENERAL COMPLIANCE AND ENFORCEMENT NEWS

### **NEW Effectiveness and Enhancement Survey Available**

The [NERC Compliance Guidance program](#) has been in effect since 2016, and NERC, as part of our continuous improvement efforts, is in the process of assessing the effectiveness of this program. NERC is reaching out to industry for feedback and improvement suggestions.

As users of Implementation Guidance, industry can assist us and affect positive change by completing the short [survey](#). NERC requests you forward this survey to additional personnel you believe may be appropriate to reflect the broader industry. This is a great opportunity to assist in improving this program from an Implementation Guidance user perspective. **The survey is open through October 11, 2019.**

### **NEW 2020 ERO CMEP Implementation Plan Posted**

NERC has posted the [2020 ERO Compliance Monitoring and Enforcement Program \(CMEP\) Annual Implementation Plan](#) (IP). This annual operating plan is used by Compliance Enforcement Authorities (CEAs) to implement the CMEP. The CEAs, which include NERC and the six Regional Entities, carry out CMEP activities in accordance with the NERC Rules of Procedure (ROP) and Appendix 4C.

It includes the annual identification and prioritization of risk elements. The ERO identifies and prioritizes risks following the Risk Elements Development Process, which is found as Appendix C in the [ERO Enterprise Guide for Compliance Monitoring](#). The risk elements are becoming more risk-based this year as risks selected for increased focus are more specific than previously.

The ERO Enterprise is pleased to release an enhanced, easier to use CMEP IP for this year. Collectively, NERC and each RE have worked collaboratively throughout this IP's development to streamline the ROP timing and risk assessment processes into one cohesive narrative, compared to a main IP with several regional appendices as in years past. By streamlining the development in this manner, the ERO Enterprise believes that it is also more effectively and efficiently fulfilling the timing and risk assessment obligations of the CMEP IP, which will also enhance efforts to modify and adjust going forward. Through this enhancement, the ERO Enterprise will address areas where there may be specific regional considerations in the main risk element description itself. The ERO Enterprise believes that this will make the IP both more user-friendly and relevant to registered entities. Specifically, the implementation plan represents the ERO Enterprise's high-level priorities for its CMEP. While the ERO Enterprise will determine individual monitoring decisions for each registered entity based on their unique characteristics, registered

### Quick Links

- [Risk-Based CMEP](#)
- [CIP V5 Transition Program](#)
- [ERO Enterprise Program Alignment Process](#)
- [Consistency Reporting Tool \(EthicsPoint\)](#)
- [Risk-Based Registration Initiative](#)
- [Reliability Standard Audit Worksheets](#)
- [Enforcement & Mitigation: Enforcement Actions](#)
- [Align Project \(formerly CMEP Technology Project\)](#)

entities should consider the risk elements and their associated areas of focus as they evaluate opportunities and their own prioritization to enhance internal controls and compliance operations focus.

### STANDARDS SUBJECT TO FUTURE ENFORCEMENT

Please refer to the [U.S. Effective Dates page](#) for more detail on the standards listed below.

U.S. Effective Dates for Reliability Standards	
U.S. Effective Date	Standard(s)
<b>October 1, 2020</b> <b>EFFECTIVE THIS WEEK</b>	<a href="#">IRO-006-WECC-3 – Qualified Path Unscheduled Flow (USF) Relief</a>
<b>January 1, 2020</b>	<a href="#">CIP-003-7 – Cyber Security – Security Management Controls</a>
	<a href="#">IRO-002-6 – Reliability Coordination – Monitoring and Analysis</a>
	<a href="#">PRC-026-1 – Relay Performance During Stable Power Swings (Requirements R2–R4)</a>
	<a href="#">TPL-007-3 – Transmission System Planned Performance for Geomagnetic Disturbance Events (Requirements R5, 5.1, 5.2, R9, 9.1, and 9.2)</a>
<b>April 1, 2020</b>	<a href="#">CIP-003-8 – Cyber Security – Security Management Controls</a>
<b>July 1, 2020</b>	<a href="#">CIP-005-6 – Cyber Security – Electronic Security Perimeter(s)</a>
	<a href="#">CIP-010-3 – Cyber Security – Configuration Change Management and Vulnerability Assessments</a>
	<a href="#">CIP-013-1 – Cyber Security – Supply Chain Risk Management</a>
<b>October 1, 2020</b>	<a href="#">PRC-002-2 – Disturbance Monitoring and Reporting Requirements (50% compliance for Requirements R2–R4, R6–R11)</a>
	<a href="#">PER-006-1 – Specific Training for Personnel</a>
<b>January 1, 2021</b>	<a href="#">PRC-027-1 – Coordination of Protection Systems for Performance During Faults</a>
	<a href="#">CIP-008-6 – Cyber Security – Incident Reporting and Response Planning</a>
<b>January 1, 2021</b>	<a href="#">PRC-012-2 – Remedial Action Schemes</a>
	<a href="#">TPL-007-3 – Transmission System Planned Performance for Geomagnetic Disturbance Events (Requirements R11 and R12)</a>
<b>January 1, 2022</b>	<a href="#">TPL-007-3 – Transmission System Planned Performance for Geomagnetic Disturbance Events (Requirements R6, 6.1–6.4, R10, 10.1–10.4)</a>

July 1, 2022	<a href="#">PRC-002-2 – Disturbance Monitoring and Reporting Requirements (100% compliance for Requirements R2–R4, R6–R11)</a>
January 1, 2023	<a href="#">TPL-007-3 – Transmission System Planned Performance for Geomagnetic Disturbance Events (Requirements R3, R4, 4.1, 4.1.1–4.1.2, 4.2, 4.3, 4.3.1, R8, 8.1, 8.1.1–8.1.2, 8.3, 8.4, and 8.4.1)</a>
January 1, 2024	<a href="#">TPL-007-3 – Transmission System Planned Performance for Geomagnetic Disturbance Events (Requirements R7, 7.1, 7.2, 7.3, 7.3.1–7.3.2, 7.4, 7.4.1–7.4.3, 7.5, and 7.5.1.)</a>

## BOARD OF TRUSTEES AND FERC ACTION

### NEW NERC Filings

On September 23, 2019, NERC submitted to FERC the annual TFE report in FERC Docket No. RR10-1-000 and RR13-3-000. The [2019 Annual Report of the Wide-Area Analysis of Technical Feasibility Exceptions](#) is filed in compliance with Paragraphs 220 and 221 of FERC’s [Order No. 706](#).

NERC’s 2019 filings to FERC are available [here](#).

## UPCOMING EVENTS

For information about other 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](#).

### Workshops and Conferences

- GridSecCon 2019 – October 22–25, 2019, Atlanta | [Register](#)
- **SAVE THE DATE** Probabilistic Analysis Forum – December 11–13, 2019, Atlanta | **Registration Coming Soon**

### Webinars

- Improvements to Compliance and Enforcement Pages on NERC.com Webinar – 2:00–2:30 p.m. Eastern, October 8, 2019 | [Register](#)
- [FERC/NERC/Regional Entity Cold Weather Event Report](#) Webinar – 2:00–3:00 p.m. Eastern, October 10, 2019 | [Register](#)
- [Recommended Improvements to Interconnection Requirements for Inverter-Based Resources](#) Webinar – 12:30–2:30 p.m. Eastern, October 11, 2019 | [Register](#)
- Improvements to Compliance and Enforcement Pages on NERC.com Webinar – 3:00–3:30 p.m. Eastern, November 14, 2019 | [Register](#)
- Improvements to Compliance and Enforcement Pages on NERC.com Webinar – 2:00–2:30 p.m. Eastern, December 9, 2019 | [Register](#)



### Standing Committee Meetings and Conference Calls

- **NEW** Standards Committee Special Call – 3:00–4:00 p.m. Eastern, October 2, 2019 | [Register](#)
- Member Representatives Committee Pre-Meeting Conference Call and Informational Webinar – 11:00–12:30 p.m. Eastern, October 10, 2019 | [Register](#)
- Board Committees, Member Representatives Committee, and Board of Trustee Meetings – November 5–6, 2019 | [Meeting and Hotel Registration](#)

### Standard Drafting Team Meetings and Conference Calls

The [Standards calendar](#) provides dial-in information for the in-person meetings below. The calendar also provides information about conference calls that drafting teams may hold in addition to in-person meetings.

- Project 2017-01 – Modifications to BAL-003-1.1 Drafting Team Meeting – October 8–10, 2019, Golden, CO | [Register](#)
- Project 2019-02 – BES Cyber System Information Access Management Drafting Team Meeting – October 16–17, 2019, San Antonio, TX | [Register](#)
- Project 2016-02 – Modifications to CIP Standards Drafting Team Meeting – October 22–24, 2019, Lakewood, CO | [Register](#)

## ABOUT THE STANDARDS, COMPLIANCE, AND ENFORCEMENT BULLETIN

This weekly bulletin compiles a list of standards, compliance, and enforcement projects with actionable deadlines, as well as upcoming events, recently posted resources, other NERC documents posted for comment, and other relevant news and information. Please email [Amy Klagholz](#) with feedback on this bulletin. The current bulletin and old bulletins are available under “Program News” on both the [Standards home page](#) and the [Compliance & Enforcement home page](#).

If you would like to receive this bulletin or be added to the distribution list for a particular project, please submit a ticket through the [Help Desk](#). Select the “NERC Email Distribution List” option under the “Applications” menu. In the Description Box, please specify which lists you would like your email address to be added to or note which announcements you would like to receive. This bulletin is distributed to several lists, including the Standards distro list (Standards-specific announcements) and the NERC-info distro list (most NERC announcements).