

# Standards, Compliance, and Enforcement Bulletin

April 3–9, 2023

## INSIDE THIS EDITION

[Active Standards Postings](#) | [Other Active Comment Periods](#) | [Standards News](#) | [General Compliance and Enforcement News](#) | [Other 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 2021-07 – Extreme Cold Weather Grid Operations, Preparedness, and Coordination</a>   Draft 2	<a href="#">Initial Ballots and Non-binding Polls</a>	04/04/23	04/13/23

### Join Ballot Pools

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

### Posted for Comment

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

<a href="#">Project 2021-07 – Extreme Cold Weather Grid Operations, Preparedness, and Coordination</a>   Draft 2	<a href="#">Comment Period</a>	02/28/23	04/13/23
<a href="#">Texas Reliability Entity, Regional Standard Development Process</a>	<a href="#">Comment Period</a>	03/08/23	04/21/23
<b>NEW</b> <a href="#">Project 2023-04 – Modifications to CIP-003</a>   SAR	<a href="#">Comment Period</a>	03/31/23	05/15/23

### Posted for Comment

Posting	Action	Start Date	End Date
<p><b>Comment Period Open for Proposed Data Request Regarding Internal Network Security Monitoring:</b> Pursuant to NERC Rules of Procedure Section 1600, NERC is posting a <a href="#">proposed data request regarding internal network security monitoring</a> for a 21-day comment period concluding on April 14, 2023. The proposed data request is in response to a Federal Energy Regulatory Commission directive in Order No. 887 to conduct a study on the risks of the lack of, and challenges to implementing, internal network security monitoring for medium impact Bulk Electric System (BES) Cyber Systems without External Routable Connectivity and for all low impact BES Cyber Systems. As authorized by the NERC Board of Trustees on February 16, 2023, NERC is following expedited procedures for developing the proposed data request under NERC Rules of Procedure Section 1606.</p>	Submit comments using the <a href="#">comment form</a> .	03/24/23	04/14/23
<p><b>Comment Period Open for Draft Reliability Guideline:</b> <a href="#">Draft Reliability Guideline: Operating Reserve Management - Version 4</a> is intended to provide recommended practices for the management of an appropriate mix of Operating Reserve as well as readiness to respond to loss of load events. It also provides guidance with respect to the management of Operating Reserve required to meet the NERC Reliability Standards.</p> <p>Reliability guidelines are not binding norms or parameters nor are they Reliability Standards; however, NERC encourages entities to review, validate, adjust, and/or develop a program with the practices set forth in this guideline. Entities should</p>	Submit comments via email using the <a href="#">comment form</a> .	03/06/23	04/20/23

<p>review this guideline in detail and in conjunction with evaluations of their internal processes and procedures; these reviews could highlight that appropriate changes are needed, and these changes should be done with consideration of system design, configuration, and business practices.</p> <p>The Reliability and Security Technical Committee (RSTC) approved posting for 45-day industry comment period. A draft version of the guideline has been posted on the <a href="#">Reliability Guidelines, Security Guidelines, Technical Reference Documents, and White Papers</a> page.</p>			
<p><b>Comment Period Open for Draft White Paper:</b> Energy reliability assessments are critical for assuring the reliable operation of the BPS as the penetrations of variable generation resources and/or just-in-time energy supplies increase. In turn, dispatchable and quick start units are relied upon for flexibility, where sources such as energy storage and natural gas-fired generation deliver energy to support intra-hour and inter-hour ramping to match variations in demand and energy production from the rest of the fleet. Energy reliability assessments account for the finite nature of stored fuels and their replenishment characteristics. In addition, the availability of natural gas to supply electric generation can impact reliability during high natural gas demand periods throughout the year. Energy reliability assessments provide assurance to planners and operators that resources can supply both electrical energy and ancillary services needs across a span of time.</p> <p>The purpose of the <a href="#">Considerations for Performing an Energy Reliability Assessment</a> draft white paper is to clarify what an energy reliability assessment is and recommend elements for consideration when performing an assessment. The paper is being posting for 45-day industry comment period. A draft version of the White Paper has been posted on the <a href="#">Reliability Guidelines, Security Guidelines, Technical Reference Documents, and White Papers</a> page.</p>	<p>Submit comments via email using the <a href="#">comment form</a>.</p>	<p>03/07/23</p>	<p>04/21/23</p>

<p><b>Comment Period Open for Draft Reliability Guideline:</b> The <a href="#">Draft Reliability Guideline: Integrating Reporting ACE with the NERC Reliability Standards</a> is intended to provide recommended practices for calculating and using Reporting Area Control Error (ACE) in a Tie Line Bias (TLB) control program integrated with the NERC Reliability Standards.</p> <p>The RSTC approved posting for 45-day industry comment period. A draft version of the guideline has been posted on the <a href="#">Reliability Guidelines, Security Guidelines, Technical Reference Documents, and White Papers</a> page.</p>	<p>Submit comments using the <a href="#">comment form</a>.</p>	<p>03/13/23</p>	<p>04/27/23</p>
<p><b>Comment Period Open for Draft Reliability Guideline:</b> The <a href="#">Draft Reliability Guideline: Primary Frequency Control</a> provides recommendations to the industry for frequency control, covering governor deadband and governor droop settings that can enable generating resources (synchronous, inverter-based, and other technologies) to provide needed primary frequency response (PFR) to the Interconnection.</p> <p>The RSTC approved posting for 45-day industry comment period. A draft version of the guideline has been posted on the <a href="#">Reliability Guidelines, Security Guidelines, Technical Reference Documents, and White Papers</a> page.</p>	<p>Submit comments using the <a href="#">comment form</a>.</p>	<p>03/22/23</p>	<p>05/06/23</p>

## STANDARDS NEWS

### **NEW** Nomination Period Open for Project 2023-04 – Modifications to CIP-003

NERC is seeking nominations for Project 2023-04 – Modifications to CIP-003 drafting team members through 8 p.m. Eastern, Monday, May 15, 2023. NERC is seeking individuals from organizations who possess experience with CIP-003 Security Management Controls including Generator Owner/Operator, Reliability Coordinator, Balancing Authority, Transmission Owner/Operator, and Distribution Provider. The time commitment for this project is expected to be up to two face-to-face meetings per quarter (on average two full working days each meeting) with conference calls scheduled as needed to meet the agreed-upon timeline the review or drafting team sets forth. Team members may also have side projects, either individually or by subgroup, to present to the larger team for discussion and review. Lastly, an important component of the review and drafting team effort is outreach. Members of the team will be expected to conduct industry outreach during the development process to support a successful project outcome.

By submitting a nomination form, you are indicating your willingness and agreement to actively participate in conference calls and face-to-face meetings. Previous drafting team experience is beneficial but not required. Use the [electronic form](#) to submit a nomination. Contact [Cindy Jackson](#) regarding issues using the electronic form. An unofficial Word version of the nomination form is posted on the [Standard Drafting Team Vacancies](#) page and the [project page](#).

The Standards Committee is expected to appoint members to the SAR drafting team in June or July 2023. Nominees will be notified shortly after they have been appointed.

### Quick Links

- [Register in the SBS](#)
- [Projected Standards Posting Schedule](#)
- [Project Tracking Spreadsheet](#)
- [2021–2023 Reliability Standards Development Plan](#)
- [Quality Review Application](#)
- [One-Stop Shop \(Status, Purpose, Implementation Plans, FERC Orders, RSAWs\)](#)
- [CIP Standards Efficiency Review](#)
- [Submit Questions or Feedback](#)

## GENERAL COMPLIANCE AND ENFORCEMENT NEWS

### **NEW** Upcoming Changes to Align Web Page

As part of the transition to the Align governance model, the [Align web page](#) is being updated and moved to the Compliance and Enforcement web page on NERC.com. The new site will contain key existing information as well as important links and documents for end users. The updated site will also contain new features such as: links to trainings and webinars; release notes to inform users of changes to the Align and SEL tools; and outage information. More details will be provided in the coming weeks.

### Quick Links

[Compliance Monitoring & Enforcement Program One-Stop Shop](#)  
[ERO Enterprise Program Alignment Process](#)  
[Consistency Reporting Tool \(EthicsPoint\)](#)  
[Risk-Based Registration Initiative](#)  
[Reliability Standard Audit Worksheets](#)  
[Enforcement & Mitigation: Enforcement Actions](#)  
[Align Project](#)

## OTHER NEWS

### **NEW** NERC Releases Recap of Technical Session's Inverter-Based Resource Panel

At its February Board of Trustees meeting, NERC introduced the addition of technical sessions to each quarterly Member Representatives Committee/Board meeting to foster deep discussion into current risks. The inaugural technical session focused on three topics: winter preparations, recent physical attacks, and the integration of inverter-based resources. NERC has released a [recap](#) summarizing key takeaways from the technical session's panel discussion that focused on integrating rapidly growing levels of inverter-based resources on the grid. The discussion focused on the provision of essential reliability services and the need to continue to study future grid conditions to further assist with maintaining reliability.

### **NEW** RSTC Approves EMT Modeling Reliability Guideline and a Dedicated EMT Task Force

The NERC Reliability and Security Technical Committee (RSTC) approved the [Reliability Guideline: Electromagnetic Transient Modeling for BPS-Connected Inverter-Based Resources—Recommended Model Requirements and Verification Practices](#) at its March 2023 meeting. This reliability guideline provides recommendations for the development of EMT model requirements, model quality checks, and verification practices specifically for EMT models used to represent BPS-connected inverter-based resources in reliability studies conducted by TPs and PCs. These recommendations are intended to help ensure that EMT models provided by GOs are representative of the expected behavior of the actual or planned facility to the greatest extent possible so that potential reliability risks are adequately captured in the modeling studies. The primary goal of this guideline is to enable TPs and PCs to obtain high-quality EMT models for BPS-connected inverter-based resources (IBR) so that they can perform applicable simulations when necessary to proactively identify and better mitigate emerging reliability risks. The RTSC also approved a dedicated task force Electromagnetic Transient Modeling Task Force (EMTTF) to support and accelerate industry adoption of EMT modeling

and simulation in their interconnection and planning studies of BPS-connected IBRs by providing guidance and references materials to TPs and PCs to more adequately assess BPS impacts and reliability risks of interconnecting IBRs. The EMTTF is open to industry members. For membership you *must* have an [ERO Portal account](#).

### **NEW Technical Reference Document Posted**

The RSTC also approved the Security Working Group's (SWG) [Technical Reference Document: CIP-002 Categorization Practices to Build on Lessons Learned](#) at the March 2023 meeting.

The Federal Energy Regulatory Commission (FERC) released the document [2020 Staff Report Lessons Learned from Commission-Led CIP Reliability Audits](#) in October 2020. It contained lessons learned from audits led by FERC staff of NERC's Critical Infrastructure Protection (CIP) Reliability Standards. Among the issues discussed in the report were categorization practices Responsible Entities use to determine the impact rating of substations.

FERC reported that some entities did not properly consider the interdependency of relay schematics and configurations between control houses containing separate voltage levels in their categorization. This shortcoming can lead to the misidentification of a Bulk Electric System (BES) Cyber System located at a substation as low impact instead of medium impact, thus resulting in insufficient protection measures being applied to that BES Cyber System.

The SWG reviewed the FERC report and prepared this document to help Responsible Entities improve their impact rating categorization process and to help ensure that they consistently categorize and protect BES Cyber Systems to maximize the reliable operation of the BES.

**STANDARDS SUBJECT TO FUTURE ENFORCEMENT**

Please refer to the [U.S. Effective Dates page](#) for the most up-to-date information on effective dates and for more detail on the below.

<b>U.S. Effective Dates for Reliability Standards</b>	
<b>U.S. Effective Date</b>	<b>Standard(s)</b>
<b>April 1, 2023</b>	<a href="#">EOP-011-2 – Emergency Preparedness and Operations</a>
	<a href="#">IRO-010-4 – Reliability Coordinator Data Specification and Collection</a>
	<a href="#">TOP-003-5 – Operational Reliability Data</a>
<b>July 1, 2023</b>	<a href="#">TPL-001-5.1 – Transmission System Planning Performance Requirements</a>   <a href="#">Implementation Plan</a>
<b>January 1, 2024</b>	<a href="#">CIP-004-7 – Cyber Security – Personnel &amp; Training</a>
	<a href="#">CIP-011-3 – Cyber Security - Information Protection</a>
	<a href="#">FAC-001-4 – Facility Interconnection Requirements</a>   <a href="#">Implementation Plan</a>
	<a href="#">FAC-002-4 – Facility Interconnection Studies</a>   <a href="#">Implementation Plan</a>
	<a href="#">TPL-007-4 – Transmission System Planned Performance for Geomagnetic Disturbance Events (Requirements R7, 7.1–7.3, 7.3.1–7.3.2, 7.4, 7.4.1–7.4.3, 7.5, 7.5.1., R11, 11.1–11.3, 11.3.1–11.3.2, 11.4, 11.4.1–11.4.3, 11.5, and 11.5.1)</a>
<b>April 1, 2024</b>	<a href="#">FAC-003-5 – Transmission Vegetation Management</a>
	<a href="#">FAC-011-4 – System Operating Limits Methodology for the Operations Horizon</a>
	<a href="#">FAC-014-3 – Establish and Communicate System Operating Limits</a>
	<a href="#">IRO-008-3 – Reliability Coordinator Operational Analyses and Real-time Assessments</a>
	<a href="#">PRC-023-5 – Transmission Relay Loadability</a>   <a href="#">Implementation Plan</a>
	<a href="#">PRC-002-3 – Disturbance Monitoring and Reporting Requirements</a>   <a href="#">Implementation Plan</a>
	<a href="#">PRC-026-2 – Relay Performance During Stable Power Swings</a>   <a href="#">Implementation Plan</a>
<a href="#">TOP-001-6 – Transmission Operations</a>	
<b>October 1, 2024</b>	<a href="#">EOP-012-1 – Extreme Cold Weather Preparedness and Operations</a> (Requirements 1–2 effective 4/1/28; Requirement 4 effective 10/1/29)



## BOARD OF TRUSTEES AND FERC ACTION

### **NEW NERC Filings**

On March 27, 2023, NERC submitted its [2023 NERC Standards Report, Status, and Timetable for Addressing Regulatory Directives](#). The annual report is in accordance with Section 321.6 of the NERC Rules of Procedure. You can find all filings to FERC for 2023 [here](#).

## UPCOMING EVENTS

For information about other NERC events, such as meetings and conference calls for other standing committees, subcommittees, task forces, and working groups, please refer to the [NERC calendar](#).

### **Workshops and Conferences**

- 2023 Probabilistic Analysis Forum – October 10–12, 2023, Salt Lake City, UT | **Save the Date**
- GridSecCon 2023 – October 17–20, 2023 | **Save the Date**

### **Webinars**

- **NEW** ERO Enterprise Facility Rating Management Webinar – 1:00–4:30 p.m. Eastern, May 24, 2023 | [Register](#)

### **Standing Committee Meetings and Conference Calls**

- Member Representatives Committee Pre-Meeting Conference Call and Informational Webinar – 11:00–12:00 p.m. Eastern, April 12, 2023 | [Register](#)
- Compliance and Certification Committee Meeting – April 26–27, 2023, Austin, TX | [Day 1 Virtual Registration](#) | [Day 1 In-Person Registration](#) | [Day 2 Virtual Registration](#) | [Day 2 In-Person Registration](#)
- Second Quarter Board of Trustees, Board Committees, and Member Representatives Committee Meetings – May 10–11, 2023 | [Meetings Registration](#) | [Schedule of Events](#)

### **Standard Drafting Team Meetings**

- Project 2016-02 – Modifications to CIP Standards Drafting Team Meeting – 12:00–2:00 p.m. Eastern, April 3, 2023 | [Register](#)
- Project 2022-03 – Energy Assurance with Energy-Constrained Resources Standard Drafting Team Meeting – 12:30–2:00 p.m. Eastern, April 3, 2023 | [Register](#)

- **NEW** Project 2022-05 – Modifications to CIP-008 Reporting Threshold SAR Drafting Team Meeting – 3:00–4:30 p.m. Eastern, April 3, 2023 | [Register](#)
- Project 2022-04 – EMT Modeling SAR Drafting Team Meeting – April 4–5, 2023, Atlanta | [Register](#)
- **NEW** Project 2020-02 – Modifications to PRC-024 Drafting Team Meeting – 1:00–3:00 p.m. Eastern, April 4, 2023 | [Register](#)
- Project 2021-04 – Modifications to PRC-002 – Phase II Standard Drafting Team Meeting – April 5–6, 2023, Atlanta | [Register](#)
- **NEW** Project 2022-01 – Reporting ACE Definition and Associated Terms Drafting Team Meeting – 1:00–3:00 p.m. Eastern, April 5, 2023 | [Register](#)
- Project 2021-07 – Extreme Cold Weather Grid Operations, Preparedness, and Coordination Standard Drafting Team Meeting – 1:00–3:00 p.m. Eastern, April 6, 2023 | [Register](#)
- Project 2016-02 – Modifications to CIP Standards Drafting Team Meeting – 12:00–2:00 p.m. Eastern, April 7, 2023 | [Register](#)
- Project 2016-02 – Modifications to CIP Standards Drafting Team Meeting – 2:00–4:00 p.m. Eastern, April 10, 2023 | [Register](#)
- Project 2021-07 – Extreme Cold Weather Grid Operations, Preparedness, and Coordination Standard Drafting Team Meeting – 1:00–3:00 p.m. Eastern, April 11, 2023 | [Register](#)
- **NEW** Project 2022-05 – Modifications to CIP-008 Reporting Threshold SAR Drafting Team Meeting – 3:00–4:30 p.m. Eastern, April 12, 2023 | [Register](#)
- Project 2016-02 – Modifications to CIP Standards Drafting Team Meeting – 11:00 a.m.–1:00 p.m. Eastern, April 13, 2023 | [Register](#)

### **ERO Enterprise Events**

- **SERC** 2023 Extreme Weather Webinar – 9:00 a.m.–12:00 p.m. Eastern, April 13, 2023 | [Register](#)
- **SERC** Long-Term Reliability Assessment Overview Webinar – 2:00–3:00 p.m. Eastern, April 18, 2023 | [Register](#)
- **Texas RE** 2023 Spring Standards, Security, and Reliability Workshop – 9:00 a.m.–3:30 p.m. Central, April 27, 2023 | [Register](#)
- **SERC** 2023 System Operator Conference #2 – May 2–4, 2023 | [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](#).

**REGISTRATION:** If you would like to receive this bulletin or be added to a NERC distribution list, you **must** first register an account in the [ERO Portal](#). Once you have registered your ERO Portal account, authenticated your credentials with DUO, and completed your profile, please submit a ticket through the [Help Desk](#) by selecting 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. If you are unsure of which distribution list you would like to be added to, an excellent starting point is the “[Committee](#)” page. You can note the committee abbreviation, which represents the distribution list you would like to join, in the Description Box. If you have other NERC-related or specific Standards projects you’re interested in, you may request those as well. If you’re interested in general information, please request to be added to the NERC-info distribution list, which covers most NERC announcements. This bulletin is distributed to several lists, including the Standards distribution list (Standards-specific announcements) and the NERC-info distribution list.