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September 12, 2022

# **VIA ELECTRONIC FILING**

Ms. Kimberly D. Bose Secretary Federal Energy Regulatory Commission 888 First Street, N.E. Washington, D.C. 20426

**Re:** North American Electric Reliability Corporation

**Docket No. RR22-4-000** 

Submission of Corrected Attachment 3 to Request for Acceptance of 2023 Business Plans and Budgets of NERC and Regional Entities and for Approval of Proposed Assessments to Fund Budgets

Dear Ms. Bose:

The North American Electric Reliability Corporation (NERC) hereby submits Corrected Attachment 3 – Midwest Reliability Organization Proposed 2023 Business Plan and Budget, to the "Request of the North American Electric Reliability Corporation for Acceptance of its 2023 Business Plan and Budget and the 2023 Business Plans and Budgets of Regional Entities and for Approval of Proposed Assessment to Fund Budgets," originally filed with the Commission on August 23, 2023. NERC also respectfully requests that the Commission set an abbreviated, 14-day comment period for Corrected Attachment 3.

NERC's filing consists of: (1) this transmittal letter, (2) the narrative text of this filing, which follows this transmittal letter, and (3) Corrected Attachment 3 – Midwest Reliability Organization Proposed 2023 Business Plan and Budget, all of which are being transmitted in a single pdf file.

Please contact the undersigned if you have any questions concerning this filing.

Respectfully submitted,

/s/ Owen E. MacBride Owen E. MacBride

Attorney for North American Electric Reliability Corporation

# UNITED STATES OF AMERICA Before the FEDERAL ENERGY REGULATORY COMMISSION

NORTH AMERICAN ELECTRIC	)	
RELIABILITY CORPORATION	)	Docket No. RR22-4-000
	)	

# THE NORTH AMERICAN ELECTRIC RELIABILITY CORPORATION SUBMITS CORRECTED ATTACHMENT 3 – MIDWEST RELIABILITY ORGANIZATION PROPOSED 2023 BUSINESS PLAN AND BUDGET

The North American Electric Reliability Corporation ("NERC") hereby submits to the Federal Energy Regulatory Commission ("Commission") a Corrected Attachment 3 – Midwest Reliability Organization Proposed 2023 Business Plan and Budget, to NERC's August 23, 2022 filing in this docket. NERC also requests that the Commission set an abbreviated comment period of 14 days for this submission. In support, NERC respectfully states as follows:

- 1. On August 23, 2022, NERC submitted to the Commission the "Request of the North American Electric Reliability Corporation for Acceptance of its 2023 Business Plan and Budget and the 2023 Business Plans and Budgets of Regional Entities and For Approval of Proposed Assessments to Fund Budgets" ("2023 Business Plan and Budget Filing"). Included in the 2023 Business Plan and Budget Filing was Attachment 3 Proposed 2023 Business Plan and Budget of Midwest Reliability Organization ("Original Attachment 3"). This filing was assigned Docket No. RR22-4-000.
- 2. Subsequent to the August 23, 2022 filing, it was brought to NERC's attention that there may be errors in Original Attachment 3, specifically, certain numbers in the summary tables for certain of Midwest Reliability Organization's ("MRO") statutory programs on pages 18, 21, 24, and 27 did not match what should be the corresponding numbers in the Statements of Activities for the four respective statutory programs, on pages 20, 23, 26 and 29 of Original Attachment 3.

- 3. Upon review, NERC and MRO determined that certain numbers in tables in Original Attachment 3 were in fact incorrect and that the affected tables should be replaced and a Corrected Attachment 3 submitted to the Commission in this docket. The affected tables are Table 2 on page 14, the summary tables on pages 18, 21, 24, and 27, and the table in Section D on page 62, of Original Attachment 3.<sup>1</sup> (The pagination in Original Attachment 3 and Corrected Attachment 3 is the same.) Further, it was determined that all numbers in the Statements of Activities on pages 20, 23, 26 and 29 of Original Attachment 3 are correct.
- 4. NERC is hereby submitting to the Commission Corrected Attachment 3 with the necessary corrections to Table 2 on page 14, the summary tables on pages 18, 21, 24, and 27, and the table in Section D on page 62. NERC and MRO request that Original Attachment 3 be replaced by Corrected Attachment 3.
- 5. The corrections incorporated in Corrected Attachment 3 do not result in any changes to MRO's overall proposed 2023 statutory budget, its proposed 2023 total assessment, or its proposed 2023 statutory assessment to load-serving entities ("LSEs") in the United States. Nor do the corrections result in any changes to the total 2023 NERC and Regional Entity budget, assessments, or statutory assessments to U.S. LSEs, nor change the assessment to any individual LSE, Balancing Authority, or designee.

# **Request for Abbreviated Comment Period for Corrected Attachment 3**

NERC apologizes for the errors in Original Attachment 3 that are corrected in Corrected Attachment 3, but also notes that per the Commission's regulations, the Commission's order on NERC's and the Regional Entities' 2023 Business Plans and Budgets is to be issued on or before

<sup>&</sup>lt;sup>1</sup> However, the Budget 2022, Projection 2022, and Total numbers in the table on page 14 of Original Attachment 3 are correct.

November 2, 2023. 18 C.F.R. §39.4(c). Accordingly, NERC respectfully requests that the Commission set an abbreviated, 14-day comment period, expiring September 26, 2022, for comments on Corrected Attachment 3.<sup>2</sup> An abbreviated comment period is warranted because NERC is submitting only one Regional Entity 2023 Business Plan and Budget with a small number of corrections that do not result in any changes to MRO's or NERC's proposed total 2023 statutory budgets, total 2023 assessments, total 2023 statutory (U.S.) assessments, or the charges to individual LSEs, Balancing Authorities, or designees.

Wherefore, the North American Electric Reliability Corporation respectfully requests the Commission to accept this submission of Corrected Attachment 3, replace Original Attachment 3 with Corrected Attachment 3, set an abbreviated, 14-day comment period for this submission, and accept and approve Corrected Attachment 3 as the Midwest Reliability Organization's Business Plan and Budget for 2023 in the Commission's Order in this docket.

# Respectfully submitted,

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<sup>&</sup>lt;sup>2</sup> The comment period set by the Commission for NERC's 2023 Business Plan and Budget filing, filed on August 23, 2022, is 21 days and expires on September 13, 2022.

# **DOCKET NO. RR22-4-000**

# NORTH AMERICAN ELECTRIC RELIABILITY CORPORATION

# 2023 BUSINESS PLAN AND BUDGET FILING

# **CORRECTED ATTACHMENT 3**

MIDWEST RELIABILITY ORGANIZATION

PROPOSED 2023 BUSINESS PLAN AND BUDGET



# **Midwest Reliability Organization**

# 2023 Business Plan and Budget

Approved by MRO Board of Directors: June 23, 2022 Corrected September 9, 2022

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# Introduction

The following table summarizes the 2023 Midwest Reliability Organization (MRO) budget.

TOTAL RESOURCES (in whole dollars)												
	2	023 Budget		U.S.		Canada	Mexico					
Statutory FTEs		78.00										
Non-statutory FTEs												
Total FTEs		78.00										
Statutory Expenses	\$	22,833,969										
Non-Statutory Expenses	\$	-										
Total Expenses	\$	22,833,969										
Statutory Inc(Dec) in Fixed Assets	\$	248,500										
Non-Statutory Inc(Dec) in Fixed Assets	\$	-										
Total Inc(Dec) in Fixed Assets	\$	248,500										
Assessment Stabilization Adjustment	\$	(2,575,194)										
Non-Statutory Stabilization Adjustment												
Total Assessment Stabilization Adjustment	\$	(2,575,194)										
Total Statutory Funding Requirement	\$	20,507,276										
Total Non-Statutory Funding Requirement	\$	-										
Total Funding Requirement	\$	20,507,276										
	_		_		_							
Statutory Funding Assessments	\$	20,507,276	\$	18,324,279	\$	2,182,997	-					
Non-Statutory Fees												
NEL		497,426,188		445,319,688		52,106,500	-					
NEL%		100.00%		89.52%		10.48%	0.00%					

Table 1. MRO 2023 Budget

#### Organizational Overview

MRO is a Delaware nonprofit<sup>1</sup> corporation that is a cross-border Regional Entity<sup>2</sup> operating under a delegation agreement (Delegation Agreement) with the North American Electric Reliability Corporation (NERC)<sup>3</sup> and in accordance with the MRO Bylaws. The MRO region covers central North America and includes all or portions of 16 states within the United States,<sup>4</sup>

.

<sup>&</sup>lt;sup>1</sup> MRO is tax exempt under Internal Revenue Service Section 501(c)(3) and under applicable State of Minnesota provisions.

<sup>&</sup>lt;sup>2</sup> 16 U.S.C. § 824o(a)(7)

<sup>&</sup>lt;sup>3</sup> The Commission certified NERC as the Electric Reliability Organization (ERO) in accordance with Section 215 of the Federal Power Act on July 20, 2006. *N. Am. Elec. Reliability Corp.*, 116 FERC ¶ 61, 062 (2006) ("ERO Certification Order"), *order on reh'g and compliance*, 117 FERC ¶ 61, 126 (2006), *aff'd sub nom. Alcoa Inc. v. FERC*, 564 F.3d 342 (D.C. Cir. 2009).

<sup>&</sup>lt;sup>4</sup> The MRO Region covers the states of Iowa, Kansas, Nebraska, Minnesota, North Dakota, and Oklahoma; and portions of Arkansas, Illinois, Louisiana, Michigan, Missouri, Montana, New Mexico, South Dakota, Texas, and Wisconsin.

Introduction MRO Core Principles

and the Canadian provinces of Saskatchewan and Manitoba. MRO's current Delegation Agreement was approved by the Federal Energy Regulatory Commission (FERC)<sup>5</sup> pursuant to FERC's authority under the Federal Power Act (FPA)<sup>6</sup> and is effective through December 31, 2025.

#### MRO's vision is:

"A highly reliable and secure North American bulk power system."

#### MRO's mission is:

"To identify, prioritize and assure effective and efficient mitigation of risks to the reliability and security of the North American bulk power system by promoting Highly Effective Reliability Organizations® (HEROs)."

MRO's vision and mission align with, and support, the Electric Reliability Organization (ERO) Enterprise's vision and mission.

Further, MRO supports the ERO Enterprise Long-Term Strategy. Working closely with registered entities and subject matter experts in the region, MRO continually identifies and assesses risks to reliability and security of the regional bulk power system. Region-specific activities to support the direction of the ERO Enterprise and address regional risks are reflected in MRO's 2022-2024 Strategic Plan (MRO Strategic Plan).

In the MRO Strategic Plan, MRO adopted the ERO Enterprise Core Principles<sup>10</sup> to guide its conduct and behaviors.

## MRO Core Principles

We are accountable for results, providing clarity and assurance of procedures, processes and controls to improve the reliability of the bulk power system. The following core principles guide our conduct and behavior:

# • Accountability

- Maintain the public trust in fulfilling responsibilities and use our funding wisely.
- Act in a timely manner on the basis of facts to address issues related to events, emerging reliability risks, the needs of stakeholders, and the public interest.

#### Independence

- o Be impartial, objective, fair, and intellectually honest.
- Ensure governance practices that provide both regulatory independence and inclusion of stakeholder expertise to address reliability and security matters.

<sup>&</sup>lt;sup>5</sup> Order Conditionally Approving Revised Pro Forma Delegation Agreement and Revised Delegation Agreements with Regional Entities, 173 FERC ¶61,277 (December 2020).

<sup>6 16</sup> U.S.C. 824 o (e)(4)

<sup>&</sup>lt;sup>7</sup> The ERO Enterprise refers to NERC and the Regional Entities collectively.

<sup>&</sup>lt;sup>8</sup> MRO expands upon the ERO Enterprise mission statement "To assure the effective and efficient reduction of risks to the reliability and security of the grid" adding the concepts of identifying and prioritizing mitigation of risks and to include the High Reliability Organization (HRO) theory and principles, which MRO brands as "HERO." Although this is not explicitly included in the ERO Enterprise mission statement, NERC also promotes the HRO theory.

<sup>&</sup>lt;sup>9</sup> ERO Enterprise Long-Term Strategy as approved by the NERC Board of Trustees December 12, 2019.

<sup>&</sup>lt;sup>10</sup> MRO made three additions in keeping with the ERO Enterprise Core Principles: 1) the addition of accountability for clarity, assurance, and results; 2) an addition to articulate using funding wisely; and 3) a description of how to strive for operational excellence.

# Inclusiveness and Transparency

- o Create opportunities for stakeholder engagement.
- Consider and balance the diverse interests of all stakeholders, including costs imposed to the consumer.
- o Leverage industry expertise and avoid unnecessary duplication.

#### Innovation

- Assess emerging risks and adapt to change.
- Encourage new ideas and prioritize efforts that contribute to improving productivity and reliable operations.

#### Excellence

- o Strive for operational excellence by being rigorous, accurate, and exacting.
- o Promote the active participation of the best technical experts.
- Make informed decisions regarding efficient use and allocation of resources.

## Integrity

- Maintain the highest levels of ethical conduct.
- o Maintain respectful relationships.
- o Protect the security of confidential information.

#### Membership and Governance

MRO membership<sup>11</sup> consists of members and adjunct members. As of April 2022, MRO had 93 members, nine of which are non-voting, adjunct members. Each voting member organization belongs to one of seven industry sectors:

- Transmission System Operator
- Generator and/or Power Marketer
- Investor Owned Utility
- Cooperative
- Municipal Utility
- Federal Power Marketing Agency
- Canadian Utility

MRO's Board of Directors is a hybrid board consisting of a combination of independent and balanced stakeholder board members. The MRO Board consists of 17 stakeholder directors elected by members from the seven industry sectors, plus 4 independent directors and 2 regional directors elected by all members. Pursuant to MRO's Bylaws, no two industry sectors can control a vote. In addition, the board has adopted procedures to ensure it carries out its responsibilities free of conflicts of interest.

The board has three committees that provide functional oversight of MRO's operations:

- Finance and Audit Committee (FAC)
- Governance and Personnel Committee (GPC)
- Organizational Group Oversight Committee (OGOC)

The board has established three advisory councils comprised of stakeholder members:

- Compliance Monitoring and Enforcement Program Advisory Council (CMEPAC)
- Reliability Advisory Council (RAC)
- Security Advisory Council (SAC)

<sup>&</sup>lt;sup>11</sup> Membership is voluntary and provides members with voting rights. There is no fee for membership.

The advisory councils are comprised of industry subject matter experts from MRO member companies tasked with identifying risks to the reliability and security of the regional bulk power system, developing mitigation strategies, and expanding outreach efforts to help registered entities become more aware of and reduce risk to their individual systems. In addition to producing educational material for the region in the form of newsletter articles and webinars, each of the advisory councils is responsible for one major outreach conference annually. The advisory councils also contribute to MRO's annual Regional Risk Assessment.

Each advisory council may have subgroups that it oversees. All organizational group charters are published on MRO's website. Board-approved *Policy and Procedure 3: Establishment, Responsibilities, and Procedures of Organizational Groups and MRO Sponsored Representatives on NERC Organizational Groups* sets out the processes for the organizational groups and MRO sponsored NERC Representatives. The three most active subgroups are the NERC Standards Review Forum (NSRF), which meets weekly to discuss ongoing NERC Standards projects, the Protective Relay Subgroup (PRS), which focuses on protection system misoperations and reviews power system events in the Region, and the Security Advisory Council Threat Forum (SACTF), which meets weekly in a trusted forum with Electricity - Information Sharing and Analysis Center (E-ISAC) staff to discuss timely threat information for the power industry.

The advisory councils also work with MRO staff and the MRO Board's OGOC to interface with NERC technical committees to ensure awareness and avoid duplication of efforts. MRO sponsors staff from member companies to participate in NERC technical committee meetings that are focused on risks most material to the MRO region. MRO reimburses the travel cost for those sponsored representatives, and the representatives report back in to one of MRO's advisory councils. Each sponsored representative is also assigned an MRO staff member to assist with these efforts. MRO also reimburses travel costs associated with participation on MRO organizational groups.

# Business Plan and Budget Development

Each year, MRO prepares a Business Plan and Budget for the following calendar year. The Business Plan and Budget takes into account the ERO Enterprise Long-Term Strategy and the MRO Strategic Plan. MRO staff develops the Business Plan and Budget with board and stakeholder input. The Business Plan and Budget process is a coordinated effort with NERC and the other Regional Entities.

NERC and the Regional Entities implement revisions to the Statement of Activities (SOA) report from time-to-time to address compliance with changing accounting standards in accordance with General Accepted Accounting Principles (GAAP). The report is also presented in a fashion that improves the effectiveness of the report to the reader and to provide a total budget amount that more closely reflects the amount of annual revenues required from assessments and other funding sources.

The draft Business Plan and Budget is reviewed by the MRO FAC and the board, and is subsequently posted for stakeholder comment. After consideration of stakeholder comments, but prior to obtaining final approval from its board of directors, MRO seeks NERC input. The MRO Board considers the final version of the Business Plan and Budget at its second quarter meeting, and upon approval, staff submits it to NERC for approval by NERC's Board of Trustees. Upon approval of NERC's Business Plan and Budget and all six Regional Entities' Business Plans and Budgets, a filing is submitted to FERC for approval, which is typically obtained in October or November of the year preceding the budget year.

#### Financial Policies and Controls

MRO adheres to internal financial controls and policies that govern its financial stewardship and guide its financial practices. MRO's board-approved *Policy and Procedure 12*: *General Finance* is used to guide prudent and sound judgement in managing the financial and physical resources of MRO.

In addition to its operating expenses, MRO's budget includes a cash reserve as specified in *Policy and Procedure 13: Reserves Policy.* 

#### Accounting and Recordkeeping

MRO uses GAAP to consistently record its financial transactions, and uses a Chart of Accounts based on NERC's System of Accounts, as required in the Delegation Agreement. Additionally, MRO maintains an accounting manual to provide instructions to accounting staff on accounting transactions and functions. MRO maintains its books on an accrual basis with monthly closings, recognizing revenues when earned and expenses when incurred. The majority of MRO expenses are labor and benefit costs. General and Administrative costs are allocated to each MRO statutory program area based on the number of full-time equivalents (FTEs) in each statutory program area.

# Organizational Structure and Staffing

MRO has five statutory departments, each of which is dedicated to one or more statutory function or program area, and five general and administrative departments. Each of the statutory departments also contributes to the Training and Education program, which provides outreach to MRO registered entities and stakeholders through MRO's newsletter and publications, workshops, webinars and conferences, as well as presentation opportunities at other industry events.

# Statutory Programs and Departments

- The Compliance Monitoring Department encompasses MRO's oversight activities (including the development of Compliance Oversight Plans (COPs)) and conducts oversight activities such as audits, spot checks, and self-certifications. This department is managed by a director who reports to the Senior Vice President and Chief Operating Officer.
- MRO's Risk Assessment and Mitigation (RAM) Department is responsible for providing an independent review of all identified potential noncompliances in the MRO region. RAM assesses the risk that potential noncompliances pose to the bulk power system and ensures that mitigation activities not only address the immediate issue, but also prevent recurrence. The department also has oversight of the Reliability Standards Program, which is responsible for monitoring NERC Reliability Standards projects, supporting the NSRF, coordinating SME teams as necessary, and providing MRO representation in the balloting of standards. The RAM Department is managed by a director who reports to the Senior Vice President and Chief Operating Officer.
- The Enforcement Department is responsible for the disposition and enforcement of noncompliance with NERC Reliability Standards and is managed by a director who reports to the Vice President, General Counsel and Corporate Secretary.
- The Reliability Analysis Department is responsible for reliability assessments, performance analysis, event analysis, situational awareness, and organization

- registration and certification. This department is managed by a director who reports to the Senior Vice President and Chief Operating Officer.
- The Security Department focuses on activities to promote identification, assessment, mitigation, and communication of cyber, physical, and operational security risks to the North American bulk power system. This department is managed by a director who reports to the Senior Vice President and Chief Operating Officer.

# General and Administrative Departments

- The Information Technology (IT) Department is responsible for providing a secure network infrastructure and information technology systems that support the users. Systems include IT, cyber, and physical security. This department is managed by a director who reports to the Vice President and Engineer for Strategy, Innovation, and Finance.
- The Legal Department is responsible for providing advice to MRO on legal and regulatory matters. The department is led by the Vice President, General Counsel and Corporate Secretary who, along with the Assistant Corporate Secretary and Senior Counsel, provides legal advice to MRO. Internal and external MRO communication matters and industry outreach are overseen by a director who reports to the Vice President, General Counsel and Corporate Secretary.
- The Human Resource Department performs all employee-related functions, including benefits administration, recruitment, retention, and talent management. This department includes a director who reports to the Vice President, General Counsel and Corporate Secretary.
- The Finance and Accounting Department performs accounting, finance, budget, facilities
  management, internal compliance, ethics, and corporate risk management, and treasury
  functions and reports to the Vice President and Engineer for Strategy, Innovation, and
  Finance, who is also the Corporate Compliance Officer and Treasurer.
- The General and Administrative Department is led by MRO's President and CEO and performs corporate administrative functions.

#### 2023 Key Strategic Goals and Supporting Activities

MRO's President and CEO has established three strategic priorities for MRO staff in 2023. The following strategic priorities support MRO's vision and mission and the ERO Enterprise Long-Term Strategy. They are forward-looking and serve to guide the key objective and support activities found within MRO's Strategic Plan:

- Ensure that MRO remains an innovative, resilient, and high-performing organization with an increased emphasis on leadership development and culture;
- Drive operational excellence throughout MRO in all processes and procedures, while emphasizing effectiveness and efficiency; and
- Develop a nimble, adaptive, and collaborative culture that allows MRO to carry out its mission as a trusted and valued member of the ERO Enterprise.

#### **Priority 1:**

Ensure that MRO remains an innovative, resilient, and high performing organization with an increased emphasis on leadership development and culture. The future of MRO relies upon developing the next generation of leaders that will continue to advance the organization's vision and mission. Improving staff training, creating career advancement and development opportunities, focusing on soft skills (in addition to technical competency), and fostering a culture of diversity, equity and inclusion are objectives in this area.

## Key Objectives:

- 1. Ensure continuous learning, growth, and career development opportunities.
- 2. Foster a culture of diversity, equity, inclusion, honesty, and trust through constructive feedback, empowerment, and clarity of roles.
- 3. Promote opportunities for cross-departmental and inter-ERO collaboration.
- 4. Formalize processes to ensure continuity of leadership and a skilled and engaged workforce.

#### Goals:

- 1. Refine performance review process to reflect current best practice.
- 2. Implement succession planning for directors and key positions.
- 3. Support staff's transition to hybrid work model by providing training and assessing effectiveness of MRO communication and collaboration tools.
- 4. Develop and implement a multifaceted leadership development program.

## **Priority 2:**

Drive operational excellence throughout MRO in all processes and procedures, while emphasizing effectiveness and efficiency. Amazing results can be achieved through a mindset of continuous improvement and the ability to imagine an invented future. Leveraging the skills of futuristic thinkers at MRO, across the ERO, and within industry, is critical to addressing complex and evolving risk. Planning for the future must be integrated with delegated responsibilities and MRO's public trust obligation to be an effective and efficient regulator, and to use funding wisely.

#### **Key Objectives**

- 1. Focus on identifying, assessing, and mitigating corporate risks and ensure expenditure of resources are prioritized and appropriately deployed.
- 2. Foster a culture of continued improvement and innovation through forward thinking and futuristic visioning.
- 3. Leverage Key Performance Indicators (KPIs) to measure operational effectiveness.
- 4. Develop a process to assess and prioritize work.

#### Goals:

- 1. Establish a corporate risk management program.
- Resource, develop and implement appropriate management action plans for NERC audits of MRO.
- 3. Implement an updated comprehensive data retention and classification program.
- 4. Establish innovation and a continuous improvement framework.
- 5. Evaluate processes and/or tools to assist with prioritization of work.

## **Priority 3:**

Develop a nimble, adaptive, and collaborative culture that allows MRO to carry out its mission as a trusted and valued member of the ERO Enterprise. The electricity industry is facing numerous, dynamic challenges that require forward-thinking insight and analysis to develop and support initiatives that ensure a highly reliable and secure bulk power system into the future. Increased coordination across all industry stakeholders, as well as other critical infrastructure sectors, is critical to MRO's success.

# Key Objectives:

- 1. Focus on advanced methods for identifying, assessing, and actively mitigating new and emerging risks to the bulk power system and ensure resources are deployed appropriately.
- 2. Lead and support ERO transformation efforts.
- 3. Expand collaborative relationships with federal, state, and provincial regulators, independent system operators, industry leadership, and the broader reliability and security ecosystem.
- 4. Ensure security and confidentiality of our partners' data and information.
- 5. Increase capability to support mitigation of increasing frequency and sophistication of cyber risks for corporate and industry (ransomware, phishing, vulnerabilities, etc.).
- 6. Be a trusted leader in providing premier and cutting-edge outreach to our stakeholders.

#### Goals:

- 1. Lead effort to implement new ERO processes for prioritization of bulk power system risks.
- 2. Streamline/centralize stakeholder outreach program.
- 3. Expand outreach/external affair efforts to be a regional industry voice.
- 4. Implement at least one project focused on each high and extreme risk identified in the 2022 MRO RRA.

#### **ERO Enterprise Model and Transformation**

The vision of the ERO Enterprise, which is comprised of NERC and the six Regional Entities, is a highly reliable and secure North American bulk power system. Its mission is to assure the effective and efficient reduction of risks to the reliability and security of the grid. The ERO Enterprise is a collaborative group of organizations with distinct roles between NERC and the Regional Entities. The ERO Enterprise strives for consistency where necessary, but recognizes that each Regional Entity addresses reliability in unique ways based on its own challenges and stakeholder needs. This model effectively blends a continent-wide scope with flexibility and responsiveness, and provides the resources to tackle emerging issues while simultaneously enabling innovative and distinctive approaches to reliability risks and challenges.

Within the ERO Enterprise model, NERC has unique responsibilities to oversee ERO program areas, set qualifications and expectations for the performance of delegated activities, and assess, train, and give feedback to corresponding Regional Entity programs. The Regional Entities have a mirrored set of responsibilities, providing input into the overall development of each program area, providing training and development to meet qualifications, and ensuring delegated functions are completed. Both NERC and the Regional Entities have an obligation to meet professional standards of independence and objectivity.

As the ERO Enterprise continues to mature, the organization is working on a transformation initiative to further leverage resources, enhance communication and collaboration, and ensure grid reliability. A set of declarations was established in 2019, committing the ERO Enterprise to:

- Work together as one team and honor each of its roles;
- Actively support ERO Enterprise activities while eliminating unnecessary duplication of work;
- Collaborate to develop clear and consistent guidance across the ERO Enterprise;
- Share information, knowledge, and resources across the ERO Enterprise;

- Develop and share harmonized messages across ERO Enterprise communications; and
- Support innovation, initiatives, and the sharing of best-practices across the ERO Enterprise.

Building upon these commitments, the ERO Enterprise is now engaging in a collaborative process to accelerate its transformation through diverse activities, including ERO Enterprise-wide town halls, joint leadership training sessions, and work among ERO Enterprise Collaboration Groups.



#### **ERO Enterprise Strategic and Operational Planning**

NERC and the Regional Entities are continually refining individual and collective operating and governance practices in support of strategic and operational goals and objectives that are designed to ensure the ERO fulfills its statutory obligations. This collaboration is done while acknowledging the unique differences across the Regional entities, and the different corporate and governance responsibilities of each entity.

In 2019, ERO Enterprise leadership came together to revise the *ERO Enterprise Long-Term Strategy* as part of an effort to streamline its strategic and operational documents and ensure alignment with the NERC Reliability Issues Steering Committee's (RISC's) currently identified bulk power system risks. This strategy, which was approved by the NERC Board of Trustees (Board) on December 12, 2019, and reaffirmed by ERO Enterprise leadership in September 2020, includes the following strategic focus areas:

- 1. Expand risk-based focus in all standards, compliance monitoring, and enforcement programs;
- 2. Assess and catalyze steps to mitigate known and emerging risks to reliability and security, leveraging the RISC's biennial *ERO Reliability Risk Priorities Report*;
- 3. Build a strong E-ISAC based security capability;
- 4. Strengthen engagement across the reliability and security ecosystem in North America; and
- 5. Capture effectiveness, efficiency, and continuous improvement opportunities.

As part of the business planning and budgeting process, NERC and the Regional Entities identify and discuss departmental goals and activities to ensure alignment with the long-term strategy and harmonization across the ERO Enterprise where appropriate. Program area narratives in each organization's Business Plan and Budget may reference how activities support each of the strategic focus areas.

Since risks to reliability and security are fluid and can be impacted by recent events, NERC and each Regional Entity may also create annual work plan priorities that summarize the most critical goals and objectives for the year. In many cases, these work plan priorities are also used for individual, departmental, and company performance measurement.<sup>12</sup>

# 2023 Overview of Cost Impacts

In developing MRO's 2023 Business Plan and Budget (2023 BP&B), MRO used shared enterprise-wide assumptions, internal strategic assumptions, and risk assumptions. Prior to obtaining final approval from its board of directors, MRO seeks NERC input and review of its annual Business Plan and Budget, including coordination of program requirements and any related key initiatives for the ERO Enterprise.

The MRO 2023 total budget (\$23.1M) increased by 15.2 percent from the 2022 total budget (\$20.0M). The 2023 statutory assessment (\$20.5M) represents a 15 percent increase from the 2022 assessment. In preceding years and as a result of the pandemic, significant draws of MRO's reserve balance were used to offset the variance between the budgeted expenditures and assessments in prior years. Increasing budget costs and fewer reserves results in higher assessments. MRO proposes to use the majority of its remaining assessment stabilization reserves to manage the variance between the budgeted expenditures and the assessments.

Other significant statutory expense changes (including capital expenditures) in the 2023 BP&B compared to the 2022 budget include:

- Increase in FTEs. An evaluation of MRO's personnel resources identified a need for seven additional staff to support the priorities identified in the board-approved strategic plan. Based on actual headcount, six staff persons will be added to support technical programs in the areas of enforcement, training and education, and reliability analysis. One staff person will be added to information technology to address internal infrastructure security initiatives. Reorganization of existing staff moved one FTE from finance to training and education. Total FTEs increase from 71 to 78 in the 2023 BP&B. The allocation of FTEs is represented on page 15. An explanation of the FTE variances is included in the Resource Requirements section in each program area in Section A.
- Increase in Salaries. A comprehensive review was completed of all staff positions
  according to MRO's pay philosophy, the current job market, and competition for talent.
  The 2023 BP&B reflects an increase in salaries of 3 percent with an additional 1.5
  percent allotted for promotions and market adjustments.
- **Increase in Benefits.** MRO measured the average cost related to health premiums per employee based on premium cost assumptions provided by MRO's benefit provider, which are higher than budgeted in 2022. A proposed increase to FTEs also results in

<sup>&</sup>lt;sup>12</sup> The *2022 ERO Work Plan Priorities* were approved by the Board in November 2021. NERC management and the Board evaluate annual work plan priorities throughout the year.

- benefit costs being higher than in the 2022 budget. The per-employee cost is applied to each department based on FTEs.
- Meetings and Travel.<sup>13</sup> MRO will host the majority of its outreach events that support
  the strategic plan at its Saint Paul office. There is one off-site workshop planned in the
  southern area of MRO's regional footprint in the 2023 BP&B. Continued use of virtual
  platforms for meetings and events will hold travel flat for MRO staff as compared with
  2022. This estimate is based on historic costs and emerging trends related to use of
  virtual technology.
- Increase in Consultant and Contract Support. The majority of MRO's consultants and contracts are used in the areas of Information Technology and Compliance Monitoring. These areas utilize additional technical support to maintain MRO's IT infrastructure and support newly implemented ERO-wide applications and tools.
- **Decrease in Office Rent.** Office rent is adjusted as a result of an estimated cost reduction due to the adoption of lease accounting standard ASC 842.
- Other Operating Expenses. Other operating expenses are increasing as a result of a
  hybrid return to the office and the increase in FTEs. These increases are reflected in
  internal staff training, office and computer supplies, temporary staffing, recruitment
  costs, and other legal and professional services.

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<sup>&</sup>lt;sup>13</sup> The extent to which COVID-19 assumptions impact meetings and travel in 2023 is based on current trends in travel and use of virtual technology. Meetings and travel are not presumed to return to pre-COVID-19 levels in 2023.

# Comparison of 2023 and 2022 Statutory Budgets

The following table and figure summarize and illustrate MRO's 2023 BP&B by program area.

Base Operating Budget	Budget 2022	Projection 2022	Budget 2023	Variance 023 Budget v 022 Budget	Variance %
Reliability Standards	\$ 158,553	\$ 158,553	\$ 236,896	\$ 78,343	49.4%
Compliance Enforcement	14,238,948	14,238,948	14,920,720	681,772	4.8%
Reliability Analysis and Organization Registration	3,692,737	3,692,737	4,846,672	1,153,935	31.2%
Training, Education and Operator Certification	858,992	858,992	1,950,810	1,091,818	127.1%
Situation Awareness and Infrastructure Security	1,085,132	1,085,132	1,127,372	42,240	3.9%
Total	\$ 20,034,361	\$ 20,034,361	\$ 23,082,469	\$ 3,048,108	15.2%

This table combines Compliance Monitoring, Risk Assessment and Mitigation, and Enforcement into Compliance Enforcement.

Table 2. Budget by Program Area

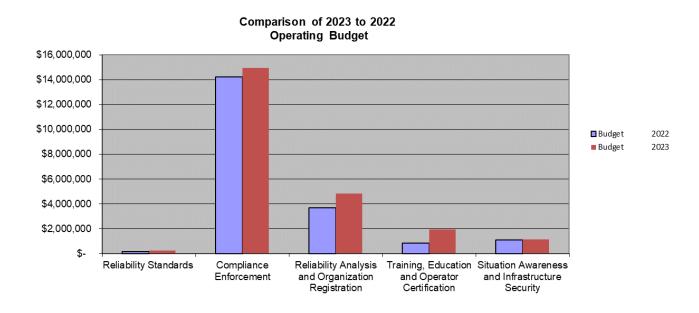


Figure 1. Budget by Program Area Chart

The following table displays total FTEs by program area.

Total FTEs by Program Area	Budget 2022	Budget 2023	Variance from 2022 Budget
STATUTORY			
Operational Programs			
Reliability Standards	0.45	0.63	0.18
Compliance	19.01	18.82	(0.19)
Compliance Risk Assessment and Mitigation	15.68	15.63	(0.05)
Compliance Enforcement	1.87	2.85	0.98
Training and Education	1.89	5.05	3.16
Reliability Analysis and Organization and Certification	9.13	12.07	2.94
Situation Awareness and Infrastructure Security	2.95	2.95	-
Total FTEs Operational Programs	50.98	58.00	7.02
Administrative Programs			
Technical Committees and Member Forums			-
General and Administrative	2.75	2.68	(0.07)
Legal	2.79	2.66	(0.13)
Information Technology	7.98	9.14	1.16
Human Resources	2.15	2.00	(0.15)
Finance and Accounting	4.35	3.52	(0.83)
Total FTEs Administrative Programs	20.02	20.00	(0.02)
Total FTEs	71.00	78.00	7.00

Table 3. Total FTEs by Program Area

For an explanation of the variances, refer to the Resource Requirements section in each program area in Section A.

2022 Budget and Projection and 2023 Budget Comparisons
The following table lists the 2022 budget and projection compared to the 2023 budget.

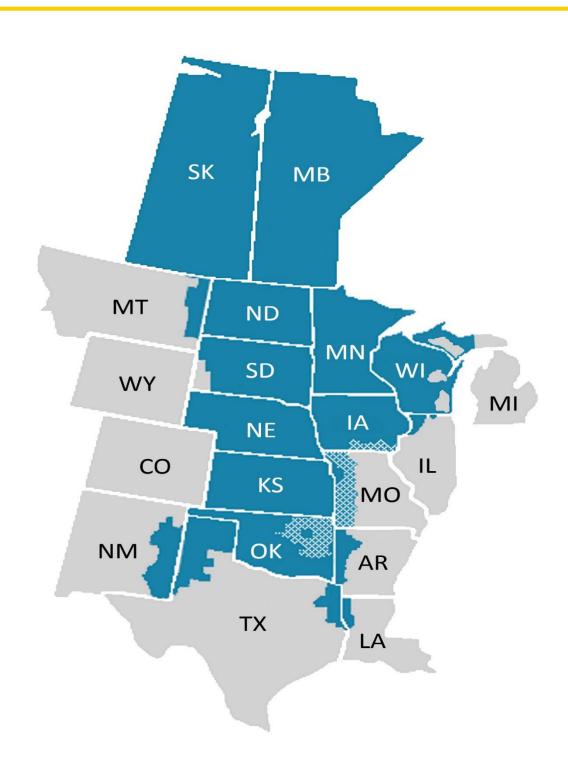
		STATUT	ORY								
	Variance 2022 Budget 2022 2022 v 2022 Projection 2023 Budget Projection Over(Under) Budget						Variance 2022 Budget 2022 v 2022 Projection			Variance 2023 Budget v 2022 Budge Over(Under)	
Funding ERO Funding											
ERO Funding  NERC Assessments  Penalties Released*  Interest & Investment Income	\$	17,832,414 458,250	\$	17,832,414 458,250	\$	- - -	\$	20,507,276 331,928 419	\$	2,674,862 (126,322 419	
Total Funding (A)	\$	18,290,664	\$	18,290,664	\$	-	\$	20,839,623	\$	2,548,959	
_											
Expenses Personnel Expenses											
Salaries	\$	11,416,562	\$	11,416,562	\$	-	\$	13,294,284	\$	1,877,72	
Payroll Taxes	\$	744,165	\$	744,165	•	-	•	863,417	•	119,25	
Benefits	\$	1,193,996	\$	1,193,996		-		1,425,181		231,18	
Retirement Costs	\$	1,922,258	\$	1,922,258		=		2,277,278		355,02	
Total Personnel Expenses	\$	15,276,980	\$	15,276,980	\$	-	\$	17,860,160	\$	2,583,18	
Meeting Expenses											
Meetings & Conference Calls	\$	178,877	\$	178,877	\$	-	\$	178,877	\$	_	
Travel	\$	581,670	\$	581,670		-		581,670		-	
Total Meeting Expenses	\$	760,547	\$	760,547	\$	-	\$	760,547	\$	-	
Operating Expenses, excluding Depreciation											
Consultants & Contracts	\$	1,204,800	\$	1,204,800	\$	_	\$	1,381,018	\$	176,21	
Office Rent	\$	1,132,100	\$	1,132,100		-		1,046,000		(86,10	
Office Costs	\$	967,934	\$	967,934		-		1,154,744		186,81	
Professional Services	\$	567,000	\$	567,000		-		631,500		64,50	
Miscellaneous		-		-		-		-		-	
Total Operating Expenses	\$	3,871,834	\$	3,871,834	\$	-	\$	4,213,262	\$	341,42	
Other Non-Operating Expenses	\$		\$		\$		\$		\$		
Indirect Expenses	\$	-	\$	-			\$	-			
Total Expenses (B)	\$	19,909,361	\$	19,909,361	\$	-	\$	22,833,969	\$	2,924,60	
Change in Net Assets (=A - B)	\$	(1,618,698)	\$	(1,618,698)	\$	-	\$	(1,994,347)	\$	(375,64	
Fixed Asset Additions, excluding Right of Use Assets (C)		125,000		125,000		_		248,500		123,50	
	\$	20,034,361	\$	20,034,361	\$	_	\$	23,082,469	\$	3,048,10	
OTAL BUDGET (Total Expenses plus Fixed Asset Additions =R ± C)			~	,	¥	-	·	,,	¥	3,370,10	
TOTAL BUDGET (Total Expenses plus Fixed Asset Additions =B + C)		, ,	ė	(1 742 600)	ć		ė	(2 242 047)			
TOTAL BUDGET (Total Expenses plus Fixed Asset Additions =B + C) TOTAL CHANGE IN RESERVES (=A-B-C)	\$	(1,743,698)	\$	(1,743,698)	\$	-	\$	(2,242,847)			

Table 4. 2022 Budget and Projection and 2023 Comparisons<sup>14</sup>

<sup>14 \*</sup>Penalties released in the current year reflects the designated amount of funds released from the Assessment Stabilization Reserve (ASR) to offset U.S. assessments as approved by the NERC Board of Trustees and FERC. Actual penalties invoiced in the current reporting year are shown as an increase in the ASR on the reserve summary table and will be reported as income on the audited financial statements in accordance with GAAP.

# **Section A – Statutory Programs**

# 2023 Business Plan and Budget



# Section A – Statutory Programs

Reliability Standards Program

The following table shows funding sources and related expenses for the Reliability Standards Program.

Reliability Standards Program (in whole dollars)													
	2022 Budget 2023 Budget												
Total FTEs		0.45		0.63		0.18							
Direct Expenses	\$	88,447	\$	142,117	\$	53,670							
Indirect Expenses	\$	69,003	\$	92,080	\$	23,077							
Other Non-Operating Expenses	\$	-	\$		\$	-							
Inc(Dec) in Fixed Assets	\$	1,103	\$	2,699	\$	1,596							
Total Funding Requirement	\$	158,553	\$	236,896	\$	78,342							

Table A-1. Reliability Standards Budget

# **Program Scope and Functional Description**

MRO's efforts related to NERC Reliability Standards support NERC's stakeholder-driven processes to develop and maintain risk-responsive Reliability Standards by providing feedback into the standards process, conducting outreach during standards development, and providing clarity to industry on enforceable standards and requirements. MRO's CMEPAC and its subgroups develop Standard Application Guides (SAGs), comment on NERC Standard projects, and participate in standards development.

#### Impact on Resource Needs

Staff support of workload and activities in Reliability Standards has a slight increase. Staff and member travel will remain flat to 2022 budgeted values.

# **Reliability Standards Program Resource Requirements**

### Overall Budget Change 2023 vs 2022 (Increase \$78.4K, 49.4%)

Overall, increased cost is due to increased staff support of subject matter expert teams that develop SAGs and outreach support in this area.

#### Personnel Expenses (Increase \$54.7K, 66.7%)

Average salary increases in the 2023 BP&B were budgeted at 3 percent and an additional 1.5 percent in promotion, equity, and market adjustments. Benefits increased due to projected increase in medical premium costs.

# **Meeting Expenses (Remain flat)**

Historic cost trends and anticipated use of virtual technology were used to retain travel cost estimates at the 2022 level.

# Indirect Expenses (Increase \$23.1K, 33.5%)

There is an overall increase in administrative services allocated to operational programs in the 2023 BP&B.

# **Reliability Standards Budget Details**

The following table shows funding sources and related expenses for the Reliability Standards Program.

Statement of Activities, Fi 2022 E				res and Ch nd 2023 Bu		Working C	apita	il		
		STANDA			ŭ					
		2022 Budget	Pr	2022 rojection	2022 v 2022	ariance 2 Budget Projection r(Under)		2023 Budget	20 v 20	Variance 23 Budget 222 Budget er(Under)
Funding										
ERO Funding  NERC Assessments  Penalties Released	\$	154,508 4,045	\$	154,508 4,045	\$	-	\$	233,286 3,605	\$	78,778 (440)
Interest		-		-		-		5		5
Total Funding (A)	\$	158,553	\$	158,553			\$	236,896	\$	78,343
Expenses										
Personnel Expenses										
Salaries	\$	58,474	\$	58,474	\$	-	\$	98,403	\$	39,928
Payroll Taxes		3,914		3,914		-		6,424		2,510
Benefits		7,319		7,319		-		11,598		4,279
Retirement Costs		10,839		10,839				17,792		6,953
Total Personnel Expenses	\$	80,547	\$	80,547	\$	-	\$	134,217	\$	53,670
Meeting Expenses										
Meetings	\$	1,400	\$	1,400	\$	-	\$	1,400	\$	-
Travel		6,500		6,500	·	-	·	6,500		-
Total Meeting Expenses	\$	7,900	\$	7,900	\$	-	\$	7,900	\$	-
Operating Expenses										
Consultants & Contracts	\$	-	\$	-	\$	-	\$	-	\$	-
Office Rent		-		-		-		-		-
Office Costs		-		-		-		-		-
Professional Services		-		-		-		-		-
Miscellaneous		-		-		-		-		-
Total Operating Expenses	\$	-	\$	-	\$	-	\$	-	\$	-
Other Non-Operating Expenses	\$	_	\$		\$		\$	_	\$	_
	_		_				_			
Indirect Expenses	\$	69,003	\$	69,003	\$	-	\$	92,080	\$	23,077
Total Expenses (B)	\$	157,450	\$	157,450	\$	-	\$	234,196	\$	76,747
Change in Net Assets (=A - B)	\$	1,103	\$	1,103	\$	-	\$	2,699	\$	1,596
Fixed Asset Additions, excluding Right of Use Assets (C)		1,103		1,103		-		2,699		1,596
TOTAL BUDGET (Total Expenses plus Fixed Asset Additions =B + 6	c) \$	158,553	\$	158,553	\$	-	\$	236,896	\$	78,343
TOTAL CHANGE IN RESERVES (=A-B-C)	\$	_	Ś		\$	_	\$	_		
TOTAL CHANGE IN RESERVES (-A-B-C)	<u> </u>		<u> </u>		<del>,</del>		<u> </u>			

Table A-2. Reliability Standards Budget Detail

Compliance Monitoring and Enforcement Program
The following table lists the budget for the Compliance Monitoring and Enforcement Program (CMEP).

Compliance Monitoring and Enforcement Program (in whole dollars)													
	2	2022 Budget		2023 Budget		Increase (Decrease)							
Total FTEs		36.56		37.30		0.74							
Direct Expenses	\$	8,543,197	\$	9,309,202	\$	766,006							
Indirect Expenses	\$	5,606,108	\$	5,451,707	\$	(154,402)							
Other Non-Operating Expenses	\$	-	\$	-	\$	-							
Inc(Dec) in Fixed Assets	\$	89,643	\$	159,811	\$	70,168							
Total Funding Requirement	\$	14,238,948	\$	14,920,720	\$	681,773							

 Table A-3.
 Compliance Monitoring and Enforcement Program Budget

# **Program Scope and Functional Description**

MRO's CMEP work is performed by three departments: Compliance Monitoring, Risk Assessment and Mitigation (RAM), and Enforcement, creating an effective "check and balance" for making decisions about noncompliance and enforcement. MRO's RAM Department develops Inherent Risk Assessments (IRAs) for registered entities to describe the risk to the BPS by the nature of the facilities each entity owns and operates. This information is used to provide a ranking of requirements for monitoring an entity based on risk. Compliance Monitoring uses the IRAs as input, along with historic entity performance, existing internal controls, and other qualitative assessments to develop Compliance Oversight Plans (COP) specific to the risk that each registered entity poses to the regional bulk power system. Oversight activities are customized for each registered entity based on the COP. In addition, RAM conducts risk assessments for registered entity noncompliances and violations and evaluates and monitors related mitigation efforts. RAM processes and submits Compliance Exception notifications to the Enforcement Department for processing. Enforcement independently reviews and processes noncompliances and violations using risk-based disposition methods, including any penalty determinations.

The 2023 BP&B contemplates that staff will perform CMEP activities for approximately 227 registered entities. The Compliance Monitoring Department will conduct approximately 14 audits and will also contribute to audits of registered entities that participate in coordinated oversight where MRO is the Affected Regional Entity. In adition to the activities described above, the Enforcement Department will review registered entity participation in the ERO Enterprise Self-Logging Program. The CMEP departments also support the MRO CMEPAC and its subgroups, and ERO Enterprise CMEP activities. These activities include supporting ERO collaboration groups, ERO outreach and training, and supporting the Align and SEL project roleouts.

#### Impact on Resource Needs

In addition to regular oversight work, the CMEP departments will dedicate resources to support the implementation of the ERO Enterprise Align and ERO Secure Evidence Locker projects, which are shared technology platforms that provide consistency and alignment of CMEP processes across NERC and the Regional Entities. These initiatives effectively focus on assessment and mitigation of reliability and security risk to the bulk power system involving lower risk registered entities in aggregate.

Compliance Monitoring and Enforcement Program Resource Requirements

# Overall Budget Change 2023 vs 2022 (Increase \$682.7K, 4.8%)

The budget increase for 2023 is due to an increase in staff resources in this area as functional activities were expanded such as the aggregated risk initiative.

### Personnel Expenses (Increase \$737.5K, 9.5%)

Average salary increases in the 2023 BP&B were budgeted at 3 percent and an additional 1.5 percent in promotion, equity, and market adjustments. Benefits increased due to projected increase in medical premium costs. An increase of 0.74 FTE will be added to this program area.

#### **Meeting Expenses (Remain flat)**

Historic cost trends and anticipated use of virtual technology were used to retain travel cost estimates at the 2022 level.

#### Indirect Expenses (Decrease \$153K, 2.7%)

The decrease in indirect expenses is due to the allocation of administrative services across all operational programs in the 2023 BP&B. Some programs absorbed more in indirect costs as those programs increased in percentage of total FTE.

Compliance Monitoring and Enforcement Program Budget Detail The following table shows funding sources and related expenses for the CMEP.

Statement of Activities, Fixe 2022 Buc				ares and Cha and 2023 Bu		Working Ca	apita			
COMPLIANCE I	NON	NITORING AND	) EN	FORCEMENT P	ROGRAN	1				
	2022 Budget		2022		Variance 2022 Budget v 2022 Projection Over(Under)			2023 Budget	20 v 2	Variance 123 Budget 1022 Budget 1/er(Under)
Funding										
ERO Funding										
NERC Assessments Penalties Released Interest	\$	13,910,317 328,631 -	\$	13,910,317 328,631 -		-	\$	14,706,986 213,464 269	\$	796,669 (115,167 269
Total Funding (A)	\$	14,238,948	\$	14,238,948			\$	14,920,720	\$	681,772
_										
Expenses Personnel Expenses										
Salaries	\$	5,792,149	\$	5,792,149	\$	_	\$	6,323,947	\$	531,798
Payroll Taxes	٠	399,863	Ţ	399,863	Ţ	_	Ų	427,795	Y	27,93
Benefits		613,759		613,759		_		685,082		71,323
Retirement Costs		987,129		987,129		_		1,093,595		106,466
Total Personnel Expenses	\$	7,792,900	\$	7,792,900	\$	-	\$	8,530,420	\$	737,520
·										
Meeting Expenses										
Meetings	\$	11,500	\$	11,500	\$	-	\$	11,500	\$	-
Travel		224,470		224,470		-		224,470		-
Total Meeting Expenses	\$	235,970	\$	235,970	\$	-	\$	235,970	\$	-
Operating Expenses										
Consultants & Contracts	\$	383,382	\$	383,382	\$		\$	348,382	\$	(35,000
Office Rent	ڔ	363,362	ڔ	363,362	Ą	_	٦	340,362	Ą	(33,000
Office Costs		130,945		130,945		_		194,430		63,48
Professional Services		130,943		130,943		_		134,430		03,40.
Miscellaneous		_		_		_				_
Total Operating Expenses	\$	514,327	\$	514,327	\$		\$	542,812	\$	28,485
Total Operating Expenses	<del>-</del>	314,327	<del>,</del>	314,327	<del></del>		<u> </u>	342,012	<del>-</del>	20,40.
Other Non-Operating Expenses	\$	-	\$	-	\$	-	\$	-	\$	-
Indirect Expenses	\$	5,606,108	\$	5,606,108	\$	-	\$	5,451,707	\$	(154,402
Total Expenses (B)	\$	14,149,305	\$	14,149,305	\$	-	\$	14,760,908	\$	611,603
Change in Net Assets (=A - B)	\$	89,643	\$	89,643	\$	_	\$	159,811	\$	70,168
Fixed Asset Additions, excluding Right of Use Assets (C)		89,643		89,643		-		159,811		70,168
FOTAL BUDGET (Total Expenses plus Fixed Asset Additions =B + C)	\$	14,238,948	\$	14,238,948	\$	-	\$	14,920,720	\$	681,77
TOTAL CHANGE IN RESERVES (=A-B-C)	\$	-	\$		\$	-	\$	-	\$	-
FTEs		36.56		36.56		-		37.30		0.7

 Table A-4.
 Compliance Monitoring and Enforcement Program Budget Detail

Reliability Analysis and Organization Registration and Certification Program The following table lists the budget for the Reliability Analysis program.

Reliability Analysis and Organization Registration and Certification (in whole dollars)														
	7	2022 Budget		2023 Budget		Increase (Decrease)								
Total FTEs		9.13		12.07		2.94								
Direct Expenses	\$	2,270,357	\$	3,030,827	\$	760,470								
Indirect Expenses	\$	1,399,994	\$	1,764,131	\$	364,138								
Other Non-Operating Expenses	\$	-	\$	-	\$	-								
Inc(Dec) in Fixed Assets	\$	22,386	\$	51,714	\$	29,327								
Total Funding Requirement	\$	3,692,737	\$	4,846,672	\$	1,153,934								

Table A-5. Reliability Analysis Department Budget

## **Program Scope and Functional Description**

MRO's Reliability Analysis Department performs reliability assessments, performance analysis, and event analysis in support of related NERC program areas. This work includes: analyses of large-scale bulk power system outages, disturbances, and near misses to determine root causes and lessons learned; the review of quarterly data submissions to assess system performance; and the availability of electric generation and transmission equipment through various NERC reporting systems, such as Transmission Availability Data Systems (TADS), Generating Availability Data Systems (GADS), Demand Response Availability Data Systems (DADS), and Misoperation Information Data Analysis Systems (MIDAS). This information may indicate the need to develop and implement targeted interventions. Reliability Analysis staff participate in the Eastern Interconnection Reliability Assessment Group (ERAG), which facilitates data collection and development of power flow and dynamics simulation models for the Eastern Interconnection. Reliability Analysis also supports MRO's Reliability Advisory Council and its subgroups, and related ERO Enterprise activities.

The Reliability Analysis Department also oversees organization registration and certification, which is required by NERC. This work involves appropriately registering all users, owners, and operators of the bulk power system in MRO's regional footprint and periodically certifying that certain registered entities (Reliability Coordinators, Balancing Authorities, and Transmission Operators) are able to perform associated tasks. All entities registered for any reliability function are required to follow mandatory NERC Reliability Standards.

# **Impact on Resource Needs**

Staffing for this program will increase by 2.94 FTEs. The addition of a power systems engineer and business data analyst will add value and streamline activities for ongoing reliability assessment analysis and the expansion of the Generator Winterization Program. Workload for OrganizationRegistration and Certification is stable in 2023.

# Reliability Analysis and Organization Registration and Certification Resource Requirements

## Overall Budget Change 2023 vs 2022 (Increase \$1.15M, 31.3%)

The budget increase for 2023 is primarily due to an increase in FTEs.

#### Personnel Expenses (Increase \$773K, 37.9%)

The average salary increase was budgeted at 3 percent and an additional 1.5 percent in promotion, equity, and market adjustments. Staff resources in this area increased as functional activities were expanded. Benefits increased due to projected increase in medical premium costs.

## Meeting Expenses (Remain flat)

Historic cost trends and anticipated use of virtual technology were used to retain travel cost estimates at the 2022 level.

# Operating Costs (Decrease \$12.7K, 13.2%)

Reflects flat costs in training and lower contract costs.

# Indirect Expenses (Increase \$364K, 26%)

There is an overall increase in administrative services expenditures that are allocated to the operational programs based on the increased FTEs.

# Reliability Analysis and Organization Registration and Certification Budget Detail

The following table lists funding sources and related expenses for the Reliability Analysis and Organization Registration and Certification Program.

203		ssets Expen t & Projection			working c	apita	" 		
RELIABILITY ANALYSI					ERTIFICAT	ION			
		2022 Budget	2022 Projection	Va 2023 v 2022	ariance  2 Budget  Projection  r(Under)		2023 Budget		Variance 2023 Budget v 2022 Budget Over(Under)
unding									
ERO Funding  NERC Assessments  Penalties Released  Interest	\$	3,610,669 82,068 -	\$ 3,610,669 82,068 -		-	\$	4,777,509 69,075 87	\$	1,166,84 (12,99
Total Funding (A)	\$	3,692,737	\$ 3,692,737			\$	4,846,672	\$	1,153,93
Expenses									
Personnel Expenses Salaries Payroll Taxes Benefits Retirement Costs Total Personnel Expenses	\$	1,528,561 100,217 154,429 254,449 2,037,657	\$ 1,528,561 100,217 154,429 254,449 <b>2,037,657</b>	\$	- - - -	\$	2,101,041 139,972 217,524 352,240 2,810,777	\$ <b>\$</b>	572,48 39,75 63,09 97,79 <b>773,12</b>
·									-
Meeting Expenses Meetings Travel Total Meeting Expenses	\$	9,000 127,600 <b>136,600</b>	\$  9,000 127,600 <b>136,600</b>	\$	- - -	\$ 	9,000 127,600 <b>136,600</b>	\$ <b>\$</b>	- -
Operating Expenses Consultants & Contracts Office Rent Office Costs Professional Services Miscellaneous Total Operating Expenses	\$	71,100 - 25,000 - - - 96,100	\$ 71,100 - 25,000 - - - 96,100	\$	- - - -	\$	41,100 - 42,350 - - 83,450	\$	(30,00 - 17,35 - - - (12,65
, -,		30,100	30,100				03,430		(12,0
Other Non-Operating Expenses	\$	-	\$ -	\$	-	\$	-	\$	-
Indirect Expenses	\$	1,399,994	\$ 1,399,994	\$	-	\$	1,764,131	\$	364,13
otal Expenses (B)	\$	3,670,351	\$ 3,670,351	\$	-	\$	4,794,958	\$	1,124,60
Change in Net Assets (=A - B)	\$	22,386	\$ 22,386	\$	-	\$	51,714	\$	29,3
ixed Asset Additions, excluding Right of Use Assets (C)		22,386	22,386		-		51,714		29,3
OTAL BUDGET (Total Expenses plus Fixed Asset Additions =B	+ C) \$	3,692,737	\$ 3,692,737	\$	-	\$	4,846,672	\$	1,153,9
						Ś			
TOTAL CHANGE IN RESERVES (=A-B-C)	\$		\$ 	\$		. <u> </u>			

Table A-6. Reliability Analysis and Organization Registration and Certification Budget Detail

# **Training and Education Program**

The following table summarizes the budget for the Training and Education program.

Training and Education (in whole dollars)										
	2	022 Budget	Increase (Decrease)							
Total FTEs		1.89		5.05		3.16				
Direct Expenses	\$	564,545	\$	1,191,073	\$	626,529				
Indirect Expenses	\$	289,812	\$	738,100	\$	448,287				
Other Non-Operating Expenses	\$	-	\$	-	\$	-				
Inc(Dec) in Fixed Assets	\$	4,634	\$	21,637	\$	17,002				
Total Funding Requirement	\$	858,993	\$	1,950,810	\$	1,091,818				

Table A-7. Training and Education Budget

# **Program Scope and Functional Description**

MRO is committed to its mission "to identify, prioritize and assure effective and efficient mitigation of risks to the reliability and security of the North American bulk power system by promoting Highly Effective Reliability Organizations® (HEROs)." One way we do this is by providing training and education to industry on the implementation of the CMEP, the application of Reliability Standards, and sharing information and best practices related to reliability and security of the bulk power system in MRO's regional footpring. The Training and Education Program provides outreach to MRO registered entities through various channels like newsletter articles, publications, workshops, webinars, roundtable events, and conferences, as well as presentation opportunities at other industry events. Continuing to provide best practices and lessons learned to stakeholders across MRO's regional footprint in an effort to reduce risk directly supports MRO's strategic plan and other ERO Enterprise initiatives.

#### Impact on Resource Needs

Since the onset of the pandemic, training, education, and outreach have been conducted through virtual mediums. The virtual environment has allowed MRO to expand its audience and enabled industry stakeholders to participate in MRO events with no additional travel costs. While the lifting of pandemic retrictions permit in-person interaction, MRO will continue to provide registered entities the opportunity to attend events virtually for the forseeable future. This hybrid format allows both in-person and virtual attendance and increases the amount of effort required to host outreach events – essentially offering the best of both worlds. Three additional staff have been added to this area to elevate MRO's outreach efforts and provide support for hybrid events.

## **Training and Education Resource Requirements**

## Overall Budget Change 2023 vs 2022 (Increase \$1.1M, 127.1%)

The budget increase for 2023 is primarily due to an increase in FTEs.

#### Personnel Expenses (Increase \$614K, 144.8%)

The average salary increase was budgeted at 3 percent and an additional 1.5 percent in promotion, equity, and market adjustments. Benefits increased due to projected increase in

medical premium costs. Staff resources increased to meet training, education, and outreach initiatives using webinar and virtual courses. This resulted in higher salary costs.

Meeting Expenses (Remain flat)

Historic cost trends and anticipated use of virtual technology were used to retain travel cost estimates at the 2022 level.

# **Operating Expense**

The addition of staff to this program includes staff-related training and other employee-related costs captured in office costs.

# Indirect Expenses (Increase \$448K, 154.7%)

There is an overall increase in administrative services expenditures that are allocated to the operational programs based on the increased FTEs.

Training and Education Budget Detail

The following table shows funding sources and related expenses for the Training and Education Program.

			Projection	_		dget					
	TR	AIN	ING and ED	UC	ATION						
			2022 Budget	P	2022 rojection	2022 v 2022 F	iance Budget Projection Under)		2023 Budget	v	Variance 023 Budget 2022 Budget over(Under)
Funding					-						,
	ERO Funding										
	NERC Assessments Penalties Released	\$	842,003 16,989	\$	842,003 16,989			\$	1,921,873 28,901	\$	1,079,87 11,91
	Interest						-		36		3
Total Fundir	g (A)	\$	858,992	\$	858,992			\$	1,950,810	\$	1,091,81
Expenses											
•	Personnel Expenses										
	Salaries	\$	319,838	\$	319,838	\$	-	\$	765,029	\$	445,19
	Payroll Taxes		20,073		20,073		-		52,590		32,51
	Benefits		31,529		31,529		-		89,316		57,78
	Retirement Costs		52,605		52,605		-		131,338		78,73
	Total Personnel Expenses	\$	424,045	\$	424,045	\$	-	\$	1,038,273	\$	614,22
	Meeting Expenses										
	Meetings	\$	90,000	\$	90,000	\$	-	\$	90,000	\$	_
	Travel		50,500		50,500	·	-	•	50,500		_
	Total Meeting Expenses	\$	140,500	\$	140,500	\$	-	\$	140,500	\$	-
	Operating Expenses										
	Consultants & Contracts	\$	_	\$	-	\$	-	\$	-	\$	-
	Office Rent		_		-		-		-		-
	Office Costs		_		-		-		12,300		12,30
	Professional Services		_		-		-		-		-
	Miscellaneous		-		-		-		-		-
	Total Operating Expenses	\$	-	\$	-	\$	-	\$	12,300	\$	12,30
	Other Non-Operating Expenses	\$	-	\$		\$	-	\$	-	\$	-
	Indirect Expenses	\$	289,812	\$	289,812	\$	-	\$	738,100	\$	448,28
Total Expens	ses (B)	\$	854,357	\$	854,357	\$	-	\$	1,929,173	\$	1,074,81
Change in N	et Assets (=A - B)	\$	4,634	\$	4,634	\$	-	\$	21,637	\$	17,00
	Additions, excluding Right of Use Assets (C)		4,634		4,634		-		21,637		17,00
OTAL BUDG	GET (Total Expenses plus Fixed Asset Additions =B + C)	\$	858,992	\$	858,992	\$	-	\$	1,950,810	\$	1,091,81
OTAL CHAP	IGE IN RESERVES (=A-B-C)	\$		\$	-	\$	-	\$	-	\$	

Table A-8. Training and Education Budget Detail

Situation Awareness and Infrastructure Security Program
The following table lists the budget for Situation Awareness and Infrastructure Security.

Situation Awareness and Infrastructure Security (in whole dollars)											
	2	2022 Budget		2023 Budget		Increase (Decrease)					
Total FTEs		2.95		2.95		-					
Direct Expenses	\$	625,546	\$	683,566	\$	58,020					
Indirect Expenses	\$	452,353	\$	431,167	\$	(21,186)					
Other Non-Operating Expenses	\$	-	\$	-	\$	-					
Inc(Dec) in Fixed Assets	\$	7,233	\$	12,639	\$	5,406					
Total Funding Requirement	\$	1,085,132	\$	1,127,372	\$	42,240					

Table A-9. Situation Awareness and Infrastructure Security Budget

# **Program Scope and Functional Description**

MRO, through the regional Reliability Coordinators and other available tools, monitors present conditions on the bulk power system and provides leadership coordination, technical expertise, and assistance to industry and governmental partners in responding to events as necessary. The department also uses data obtained from NERC Alerts to determine which entities may be more susceptible to a specific risk based on the responses. The Security Department sponsors the Security Advisory Council (SAC) and the SAC Threat Forum (SACTF). These organizational groups address cyber, physical, and operational risks to the bulk power system through training, outreach, intelligence briefings, risk assessments, weekly threat calls, and sponsorship of an annual security conference that draws over 500 attendees. The department also develops and maintains strong connections with the E-ISAC and other federal security agencies to further increase the reliability and security of the bulk power system and serves as a resource to MRO's IT department.

#### **Impact on Resource Needs**

Situational Awareness Program staff work with stakeholders to identify significant known risks to reliability, mitigate those risks, and promote a culture of reliability excellence. The workload in this area is stable.

The Infrastructure Security Program focuses on activities to promote identification, assessment, mitigation, and communication of cyber, physical, and operational risks to the reliability and security of the North American bulk power system. There is increased activity in this area requiring additional technical and expert level subject matter expertise to address the growing number of security risks, in particular the security risks identified in the Regional Risk Assessment. In addition, the department has increased activity serving as the overall administrator of the MRO Emergency Preparedness Plan, Lead NERC GridEx Planner, NERC Crisis Action Plan Lead, and co-lead for the Insider Threat Program. Additional staff resources were budgeted in 2022.

Situation Awareness and Infrastructure Security Resource Requirements

#### Overall Budget Change 2023 vs 2022 (Increase \$40.8K, 3.8%)

The portion of budget addressing security increased to realign and dedicate MRO staffing to support increased focus on security.

#### Personnel Expenses (Increase \$54.3K, 9.4%)

Average salary increases were budgeted at 3 percent with an additional 1.5 percent in promotion, equity, and market adjustments. Also, benefits increased due to projected increase in medical premium costs.

#### **Meeting Expenses (Remain flat)**

Historic cost trends and anticipated use of virtual technology were used to retain travel cost estimates at the 2022 level.

#### Indirect Expenses (Decrease \$22.6K, 5.0%)

The decrease in indirect expenses is due to the allocation of administrative services across all operational programs in the 2023 BP&B. Some programs absorbed more in indirect costs as those programs increased in percentage of total FTE.

Situation Awareness and Infrastructure Security Budget Detail
The following table shows funding sources and related expenses for the Situation Awareness
and Infrastructure Security Program.

	udge	Assets Expe et & Projecti			_	t	٠.			
SITUATION AV										
		2022 Budget	ı	2022 Projection	v 2	Variance 2022 Budget 2022 Projection Over(Under)		2023 Budget	,	Variance 2023 Budget / 2022 Budget Over(Under)
unding										
ERO Funding  NERC Assessments  Penalties Released  Interest	\$	1,058,615 26,517 -	\$	1,058,615 26,517 -	\$	- -	\$	1,110,468 16,883 21	\$	51,853 (9,634 21
otal Funding (A)	\$	1,085,132	\$	1,085,132			\$	1,127,372	\$	42,240
xpenses										
Personnel Expenses Salaries Payroll Taxes Benefits	\$	426,796 28,902 48,790	\$	426,796 28,902 48,790	\$	- - -	\$	464,895 30,578 54,105	\$	38,098 1,676 5,315
Retirement Costs Total Personnel Expenses	\$	74,320 <b>578,809</b>	\$	74,320 <b>578,809</b>	\$		\$	83,501 <b>633,079</b>	\$	9,181 <b>54,27</b> (
Total r ersonner Expenses		370,003		370,003	<del>,</del>		<u>, ,                                   </u>	033,073	<u>, , </u>	34,27
Meeting Expenses  Meetings  Travel	\$	4,277 30,500	\$ - <b>\$</b>	4,277 30,500	\$	-	\$	4,277 30,500	\$	-
Total Meeting Expenses	\$	34,777	_\$_	34,777	<u> </u>	-	<u> </u>	34,777	<u> </u>	-
Operating Expenses Consultants & Contracts Office Rent Office Costs Professional Services Miscellaneous Total Operating Expenses	\$	11,960 - - - - - 11.960	\$	11,960 - - - - - 11.960	\$	- - - - -	\$	15,710 - - - - 15,710	\$	- 3,75: - - - <b>3,75</b> :
Total Operating Expenses		11,500		11,500	<u>, ,                                   </u>			13,710	<u>, ,                                  </u>	3,73
Other Non-Operating Expenses	\$	-	\$	-	\$	-	\$	-	\$	-
Indirect Expenses	\$	452,353	\$	452,353	\$	-	\$	431,167	\$	(21,18
otal Expenses (B)	\$	1,077,899	\$	1,077,899	\$	-	\$	1,114,733	\$	36,83
hange in Net Assets (=A - B)	\$	7,233	\$	7,233	\$	<u>-</u>	\$	12,639	\$	5,40
ixed Asset Additions, excluding Right of Use Assets (C)		7,233		7,233		-		12,639		5,40
OTAL BUDGET (Total Expenses plus Fixed Asset Additions =B + C)	\$	1,085,132	\$	1,085,132	\$	-	\$	1,127,372	\$	42,24
OTAL CHANGE IN RESERVES (=A-B-C)	\$		\$		\$	-	\$	-		

Table A-10. Situation Awareness and Infrastructure Security Budget Detail

#### Administrative Services

The following table outlines the budget for Administrative Services.

		Administrative											
r	(in whole dollars)												
Direct Expenses and Fixed Assets FTEs .													
Increase Increase													
	2022 Budget	2023 Budget	(Decrease)	2022 Budget	2023 Budget	(Decrease)							
General and Administrative	\$1,862,449	\$2,997,150	\$1,134,701	2.75	2.68	(0.07)							
Legal	\$976,919	\$994,092	\$17,172	2.79	2.66	(0.13)							
Information Technology	\$2,298,664	\$2,971,820	\$673,156	7.98	9.14	1.16							
Human Resources	\$474,285	\$643,783	\$169,498	2.15	2.00	(0.15)							
Finance and Accounting	\$2,329,953	\$1,118,839	-\$1,211,114	4.35	3.52	(0.83)							
Total Administrative Services	\$7,942,270	\$8,725,684	\$783,414	20.02	20.00	(0.02)							

Table A-11. Administrative Services Budget

#### **Program Scope and Functional Description**

MRO's Administrative Services area includes the business and administrative functions of the organization, including legal and regulatory, communications, information technology, human resources, finance and accounting, and general expenses. Costs incurred for these services are allocated as an indirect expense across MRO's other program areas.

#### Methodology for Allocation of Administrative Services Expenses to Programs

All expenses for the Administrative Services programs, referred to as indirect expenses, are allocated to the delegated program areas based on the respective number of FTEs.

#### **Funding Sources**

The expenses related to the indirect program areas are being allocated entirely to the direct programs; therefore, the indirect program areas have no ERO assessment revenue.

#### General and Administrative

The following table lists the General and Administrative budget.

Ger		and Administrat whole dollars)	ive		
		2022 Budget		2023 Budget	Increase (Decrease)
	T	ZOZZ Dauget		2023 Dauget	(Deci ease)
Total FTEs		2.75		2.68	(0.07)
Total Direct Expenses	\$	1,862,449	\$	2,997,150	\$ 1,134,701
Inc(Dec) in Fixed Assets	\$	-	\$	-	\$ -
Working Capital Requirement	\$	(1,743,698)	\$	(2,242,847)	\$ (499,149)

Table A-12. General and Administrative Budget

#### **Program Scope and Functional Description**

The General and Administrative Department is led by MRO's President and CEO. The department ensures that there is appropriate attention to the execution of MRO's strategic priorities and the day-to-day management of the corporation, board governance, policies and procedures to maintain and enhance operation of the corporation, proper record-keeping, and related responsibilities under applicable regulations, as well as MRO's Delegation Agreement.

#### **General and Administrative Services Resource Requirements**

#### Overall Budget Change 2023 vs 2022 (Increase \$1.1M, 60.9%)

The budget increase for 2023 is higher due to the transfer of office rent from the Finance department to general and administrative to align this line item with other Regions.

#### Personnel Expenses (Decrease \$24K, 2.1%)

Staff resources reflect a slight decline as some time is allocated to other program areas. However, benefits increased due to projected increase in medical premium costs.

#### **Meeting Expenses (Remain flat)**

Historic cost trends and emerging trends in use of virtual technology were used to retain travel cost estimates at the 2022 level.

#### Operating Expenses (Increase \$1.7M, 207.5%)

Costs for recruitment of new independent directors was budgeted to fill vacant seats. Office rent was moved from the Finance and Accounting Department to align with ERO presentation of this line item.

General and Administrative Budget Detail

The following table shows funding sources and related expenses for the General and Administrative Program.

Statement of Activities, Fixed Assets Expenditures and Change in Working Capital 2022 Budget & Projection, and 2023 Budget												
				NISTRATIVE		•						
		2022 Budget		2022 Projection	202 v 202	'ariance 22 Budget 2 Projection er(Under)		2023 Budget	v	Variance 2023 Budget 2022 Budget Over(Under)		
unding												
ERO Funding  NERC Assessments  Penalties Released	\$	(1,743,698)	\$	(1,743,698)	\$	-	\$	(2,242,847)	\$	(499,149		
otal Funding (A)	\$	(1,743,698)	\$	(1,743,698)	\$	-	\$	(2,242,847)	\$	(499,149		
xpenses												
Personnel Expenses												
Salaries	\$	936,453	\$	936,453	\$	-	\$	908,838	\$	(27,615		
Payroll Taxes	·	34,547		34,547		-		33,958		(589		
Benefits		45,829		45,829		-		49,320		3,492		
Retirement Costs		116,820		116,820		-		117,584		763		
Total Personnel Expenses	\$	1,133,649	\$	1,133,649	\$	-	\$	1,109,700	\$	(23,949		
Meeting Expenses												
Meetings	\$	60,000	\$	60,000	\$	-	\$	60,000	\$	_		
Travel	Ċ	110,300	•	110,300		-	•	110,300		_		
Total Meeting Expenses	\$	170,300	\$	170,300	\$	-	\$	170,300	\$	-		
Operating Expenses												
Consultants & Contracts	\$	65,000	\$	65,000	\$	-	\$	80,000	\$	15,000		
Office Rent		-		-		-		1,046,000		1,046,000		
Office Costs		133,000		133,000		-		130,650		(2,350		
Professional Services		360,500		360,500		-		460,500		100,000		
Miscellaneous		-		-		-		-		-		
Total Operating Expenses	\$	558,500	\$	558,500	\$	-	\$	1,717,150	\$	1,158,650		
Other Non-Operating Expenses	\$	-	\$		\$	-	\$		\$	-		
Indirect Expenses	\$	(1,862,449)	\$	(1,862,449)	\$	-	\$	(2,997,150)	\$	(1,134,70		
otal Expenses (B)	\$	_	\$		\$	-	\$		\$	_		
hange in Net Assets (=A - B)	ċ	(1,743,698)		(1,743,698)	\$		Ś	(2,242,847)	\$	(499.149		
nange in Net Assets (-A - D)	<u> </u>	(1,745,056)	<del>,</del>	(1,745,056)	<del>-</del>	-	<u>,</u>	(2,242,647)	<del>,</del>	(455,143		
ixed Asset Additions, excluding Right of Use Assets (C)		-		-						-		
OTAL BUDGET (Total Expenses plus Fixed Asset Additions =B + C)	\$	-	\$	-	\$	-	\$	-	\$	-		
OTAL CHANGE IN RESERVES (=A-B-C)	\$	(1,743,698)	\$	(1,743,698)	\$	-	\$	(2,242,847)	\$	(499,14		

Table A-13. General and Administrative Budget Detail

Legal

The following table lists the Legal budget.

	(in	<b>Legal</b> whole dollars)		
		2022 Budget	2023 Budget	Increase (Decrease)
		LUZZ Dauget	2023 Dauget	(Decireuse)
Total FTEs		2.79	2.66	(0.13)
Total Direct Expenses	\$	976,919	\$ 994,092	\$ 17,172
Inc(Dec) in Fixed Assets	\$	-	\$ -	\$ -
Working Capital Requirement	\$	•	\$	\$ -

Table A-14. Legal Budget

#### **Program Scope and Functional Description**

MRO's Legal function is staffed by the Vice President General Counsel and Corporate Secretary, and Assistant Corporate Secretary and Senior Counsel. Advice is provided to the board, the President and CEO, and staff on legal matters affecting MRO; and corporate records for the board and organizational groups are maintained in this area. MRO may use external specialized legal resources on an as-needed basis. This functional area also focuses on and centralizes external and internal communications work.

Legal Resource Requirements

#### Overall Budget Change 2023 vs 2022 (Increase 17.2K, 1.8%)

The increase in this indirect program area is related to the increase in personnel costs.

#### Personnel Expenses (Increase \$46K, 6.4%)

Average salary increases were budgeted at 3 percent with an additional 1.5 percent in promotion, equity, and market adjustments. Benefits increased due to projected increase in medical premium costs.

#### **Meeting Expense (Remain flat)**

Historic cost trends and anticipated use of virtual technology were used to retain travel cost estimates at the 2022 level.

#### Operating Expense (Decrease \$29K, 12.1%)

The decrease in professional service costs is due to elimination of one-time costs associated with MRO's external website redesign that was budgeted in 2022. The redesign included a legal review of MRO's privacy policy and copyrighted materials.

## Legal Budget Detail

The following table shows funding sources and related expenses for the Legal Department.

			LEGAL								
		2022 Budget		P	2022 rojection	Variance 2022 Budget v 2022 Projection Over(Under)			2023 Budget	202 v 20	'ariance 23 Budget 22 Budget er(Under)
Funding	500 F (F										
	ERO Funding  NERC Assessments	\$		\$		\$	_	\$	_	\$	_
	Penalties Released	Y	_	Y	_	Y		Y	_	Y	
Total Fund		\$		\$	_	\$	_	\$	-	\$	_
Expenses	Personnel Expenses										
	Salaries	\$	552,889	\$	552,889	\$		\$	591,987	\$	39,098
	Payroll Taxes	Ş	33,056	Ş	33,056	Ş	-	Ş	33,224	Ş	169
	Benefits		47,452		47,452		_		48,952		1,500
	Retirement Costs		85,019		85,019		_		90,199		5,180
	Total Personnel Expenses	\$	718,415	\$	718,415	\$	-	\$		\$	45,947
	·										
	Meeting Expenses										
	Meetings	\$	500	\$	500	\$	-	\$	500	\$	-
	Travel	_	19,800		19,800		-		19,800	_	
	Total Meeting Expenses	\$	20,300	\$	20,300	\$	-	\$	20,300	\$	
	Operating Expenses										
	Consultants & Contracts	\$	54,900	\$	54,900	\$	-	\$	54,900	\$	-
	Office Rent		-		-		-		-		-
	Office Costs		35,804		35,804		-		39,529		3,725
	Professional Services		147,500		147,500		-		115,000		(32,500
	Miscellaneous		-		-		-		-		-
	Total Operating Expenses	\$	238,204	\$	238,204	\$	-	\$	209,429	\$	(28,775
	Other Non-Operating Expenses	\$	-	\$	-	\$	-	\$	-	\$	-
	Indirect Expenses	\$	(976,919)	\$	(976,919)	\$	-	\$	(994,092)	\$	(17,172
Total Expe	nses (B)	\$	-	\$	-	\$	-	\$	-	\$	(0
Change in	Net Assets (=A - B)	\$	-	\$	-	\$	-	\$	-	\$	0
Fixed Asse	et Additions, excluding Right of Use Assets (C)		-		-				-		-
	DGET (Total Expenses plus Fixed Asset Additions =B + C)	\$		\$	-	\$		\$		\$	(0
TOTAL CH	ANGE IN RESERVES (=A-B-C)	\$	-	\$	_	\$	_	\$	-	\$	c
	FTEs		2.79		2.79		-		2.66		(0.13

Table A-15. Legal Budget Detail

#### Information Technology

The following table lists the Information Technology budget.

Int		ation Technolog whole dollars)	у		
	2	022 Budget		2023 Budget	Increase (Decrease)
Total FTEs		7.98		9.14	1.16
Total Direct Expenses	\$	2,298,664	\$	2,971,820	\$ 673,156
Inc(Dec) in Fixed Assets	\$	-	\$	-	\$ -
Working Capital Requirement	\$	•	\$		\$ -

 Table A-16.
 Information Technology Budget

#### **Program Scope and Functional Description**

MRO's Information Technology function is responsible for providing technology and communications tools for staff to perform Regional Entity and other corporate functions. As part of this, the Information Technology function is responsible for managing and securing the IT infrastructure of the company. This includes providing ways for the company to preserve and protect the confidentiality, integrity, and availability of company data, and responding in a timely manner to the ever evolving cyber threats faced by organization. As the complexity of the security risks and tools utilized to meet staff needs continues to evolve, this function at times also utilizes highly specialized external technical resources.

#### **Information Technology Resource Requirements**

#### **Overall Budget Change 2023 vs 2022 (Increase \$673K, 29.3%)**

The increase in indirect programs is due to a combination of IT staff and consulting and contract costs related to mitigation of cyber security threats and risks.

#### Personnel Expenses (Increase \$372.3K, 28.5%)

Average salary increases were budgeted at 3 percent with an additional 1.5 percent in promotion, equity, and market adjustments. There is an increase of one FTE in this program area. Additionally, benefits increased due to projected increase in medical premium costs.

#### **Meeting Expenses (Remain flat)**

Historic cost trends and anticipated use of virtual technology were used to retain travel cost estimates at the 2022 level.

#### Operating Expenses (Increase \$177K, 20.6%)

This increase reflects costs in cyber security software and applications, as well as office costs related to staff training and other expenses for additional FTEs.

#### Fixed Asset (Increase \$123.5K, 99%)

Increased capital asset costs are due to scheduled replacement of end-of-life assets.

Information Technology Budget Detail

The following table shows funding sources and related expenses for the Information Technology Program.

		& Projectio			luget					
	INFC	PRMATION T 2022 Budget		2022 Projection	2022 v 2022	riance  2 Budget  Projection  (Under)		2023 Budget	Variance 2023 Budg v 2022 Bud	
Funding										
ERO Funding  NERC Assessments  Penalties Released	\$	- -	\$	- -	\$	-	\$	- -	\$	=
Total Funding (A)	\$	-	\$	-	\$	-	\$		\$	-
Expenses  Personnel Expenses Salaries Payroll Taxes Benefits Retirement Costs Total Personnel Expenses	\$	921,491 67,927 135,988 179,140 <b>1,304,546</b>	\$ <b>\$</b>	921,491 67,927 135,988 179,140 <b>1,304,546</b>	\$	- - - -	\$	1,187,790 85,342 167,699 236,004 <b>1,676,834</b>	\$	266,299 17,415 31,710 56,864 <b>372,288</b>
Meeting Expenses  Meetings  Travel  Total Meeting Expenses	\$ <b>\$</b>	1,200 5,000 <b>6,200</b>	\$ <b>\$</b>	1,200 5,000 <b>6,200</b>	\$	- - -	\$ <b>\$</b>	1,200 5,000 <b>6,200</b>	\$	- - -
Operating Expenses Consultants & Contracts Office Rent Office Costs Professional Services Miscellaneous	\$	549,568 - 313,350 -	\$	549,568 - 313,350	\$	- - - -	\$	670,636 - 369,650	\$	121,068 - 56,300 -
Total Operating Expenses	\$	862,918	\$	862,918	\$		\$	1,040,286	\$	177,368
Other Non-Operating Expenses	\$	-	\$	-	\$	-	\$	-	\$	-
Indirect Expenses	\$	(2,173,664)	\$	(2,173,664)	\$	-	\$	(2,723,320)	\$	(549,656
Total Expenses (B)	\$	-	\$		\$	-	\$	<u>-</u>	\$	-
Change in Net Assets (=A - B)	\$	-	\$		\$		\$	-		
Fixed Asset Additions, excluding Right of Use Assets Allocation of Fixed Assets	<b>\$</b> \$	<b>125,000</b> (125,000)	<b>\$</b> \$	<b>125,000</b> (125,000)		- -	<b>\$</b> \$	<b>248,500</b> (248,500)	<b>\$</b> \$	<b>123,500</b> (123,500
Inc(Dec) in Fixed Assets ( C )	\$	<u> </u>	\$	<u> </u>	\$		\$		\$	-
TOTAL BUDGET (Total Expenses plus Fixed Asset Additions =B + C)	\$	-	\$	-	\$	-	\$	-	\$	-
TOTAL CHANGE IN RESERVES (=A-B-C)	\$	_	Ś	-	Ś	_	Ś	-		

Table A-17. Information Technology Budget Detail

#### **Human Resources**

The following table lists the Human Resources budget.

		an Resources whole dollars)		
	2	022 Budget	2023 Budget	Increase (Decrease)
Total FTEs		2.15	2.00	(0.15)
Total Direct Expenses	\$	474,285	\$ 643,783	\$ 169,498
Inc(Dec) in Fixed Assets	\$	-	\$ -	\$ -
Working Capital Requirement	\$		\$ -	\$ -

Table A-18. Human Resources Budget

#### **Program Scope and Functional Description**

#### **Human Resources**

The Human Resources function designs, plans, and implements employee related policies and procedures in adherence with applicable federal and state laws. This function also facilitates the recruitment and retention efforts of the organization by coordinating tasks associated with the employee life cycle activities including onboarding, training, professional development, and best practice employee retention initiatives. The department engages in Diversity, Equity, and Inclusion (DEI) initiatives within the organization alongside the staff-led DEI Committee and works closely with the ERO Enterprise on similar efforts, and undertakes or supports several other important initiatives as directed by MRO's Governance and Personnel Committee.

MRO has developed a culture and talent management program that features intentional connection, communication, and training for all levels of staff. Training initiatives and opportunities for employee collaboration are planned to create peer-to-peer mentorship and information and knowledge sharing, theme-focused learning, and dedicated team building. MRO continues to review and enhance its employee engagement and culture enrichment activities in an effort to positively impact all stages of the employee life cycle from candidate identification, the onboarding experience of new employees, as well as the overall corporate culture to be an "employer of choice" that attracts and retains qualified staff.

#### **Human Resources Resource Requirements**

#### Overall Budget Change 2023 vs 2022 (Increase \$169.5K, 35.7%)

The budget change in this administrative area is primarily due to the added cost of recruiter fees and a scheduled compensation study.

#### Personnel Expense (Increase \$7.8K, 2.1%)

Average salary increases were budgeted at 3 percent with an additional 1.5 percent in promotion, equity, and market adjustments. Benefits increased due to projected increase in medical premium costs. This is partially offset by the slight decline in FTE.

#### Operating Expense (Increase \$161.7K, 169%)

Budgeted amounts in office costs increased to address recruiter fees and compensation consulting.

Human Resources Budget Detail

The following table shows funding sources and related expenses for the Human Resources Program.

2022 Bud	get	& Projection	on,	and 2023	Budge	t				
		UMAN RES								
		2022 Budget	P	2022 rojection	2022 v 2022	riance 2 Budget Projection r(Under)		2023 Budget	20 v 2	Variance 123 Budget 022 Budget ver(Under)
unding		_								
ERO Funding										
NERC Assessments	\$	-	\$	-	\$	-	\$	-	\$	-
Penalties Released	_		_				_		_	
otal Funding (A)	\$		\$		\$		\$	-	\$	-
expenses										
Personnel Expenses										
Salaries	\$	273,690	\$	273,690	\$	-	\$	275,529	\$	1,83
Payroll Taxes		18,244		18,244		-		18,801		55
Benefits		34,323		34,323		-		36,806		2,48
Retirement Costs		50,353		50,353				53,322		2,96
Total Personnel Expenses	\$	376,610	\$	376,610	\$	-	\$	384,458	\$	7,84
Meeting Expenses										
Meetings	\$	-	\$	-	\$	-	\$	-	\$	-
Travel		2,000		2,000		-		2,000		-
Total Meeting Expenses	\$	2,000	\$	2,000	\$		\$	2,000	\$	-
Operating Expenses										
Consultants & Contracts	\$	27,000	\$	27,000	\$	-	\$	125,000	\$	98,00
Office Rent		-		-		-		-		-
Office Costs		68,675		68,675		-		132,325		63,65
Professional Services		-		-		-		-		-
Miscellaneous		-				-		-		-
Total Operating Expenses	\$	95,675	\$	95,675	\$	-	\$	257,325	\$	161,65
Other Non-Operating Expenses	\$		\$		\$	-	\$		\$	
Indirect Expenses	\$	(474,285)	\$	(474,285)	\$	-	\$	(643,783)	\$	(169,49
otal Expenses (B)	\$		\$		\$		\$		\$	-
Change in Net Assets (=A - B)	\$		\$		\$	-	\$		\$	-
ixed Asset Additions, excluding Right of Use Assets (C)		-		-		-		-		-
OTAL BUDGET (Total Expenses plus Fixed Asset Additions =B + C)	\$	-	\$	-	\$	-	\$	-	\$	-
OTAL CHANGE IN RESERVES (=A-B-C)	\$	-	\$		\$	_	\$	-	\$	

Table A-19. Human Resources Budget Detail

#### Finance and Accounting

The following table lists the Finance and Accounting budget.

F		e and Accounting whole dollars)	g		
	2	2022 Budget		2023 Budget	Increase (Decrease)
Total FTEs		4.35		3.52	(0.83)
Total Direct Expenses	\$	2,329,953	\$	1,118,839	\$ (1,211,114)
Inc(Dec) in Fixed Assets	\$	-	\$	-	\$ -
Working Capital Requirement	\$	-	\$	-	\$ -

Table A-20. Finance and Accounting Budget

#### **Program Scope and Functional Description**

#### **Finance and Accounting**

The Finance and Accounting function directs the overall financial planning and accounting practices of the organization, oversees treasury, accounting, budget, tax, and audit activities, as well as the financial and accounting system controls and standards. The Finance and Accounting function also administers employee benefit plans, including the 401(k) and Retiree Medical Trust, and reports the overall outcome of MRO's annual activities to the MRO Board of Directors.

#### **Finance and Accounting Resource Requirements**

#### Overall Budget Change 2023 vs 2022 (Decrease \$1.2M, 52.0%)

The decreased costs in the Finance and Accounting area is a result of moving office rent to the General and Administrative program.

#### Personnel Expenses (Decrease 51.8K, 6.2%)

Average salary increases were budgeted at 3 percent with an additional 1.5 percent in promotion, equity, and market adjustments. Benefits increased due to projected increase in medical premium costs. The increase is offset by the reduced FTE in this program.

#### Meeting Expenses (Remain flat)

Historic cost trends and anticipated use of virtual technology were used to retain travel cost estimates at the 2022 level.

#### Operating Expenses (Decrease \$1.16M, 77.6%)

The decrease in this area is due to moving office rent to the General and Administrative program.

Finance and Accounting Budget Detail

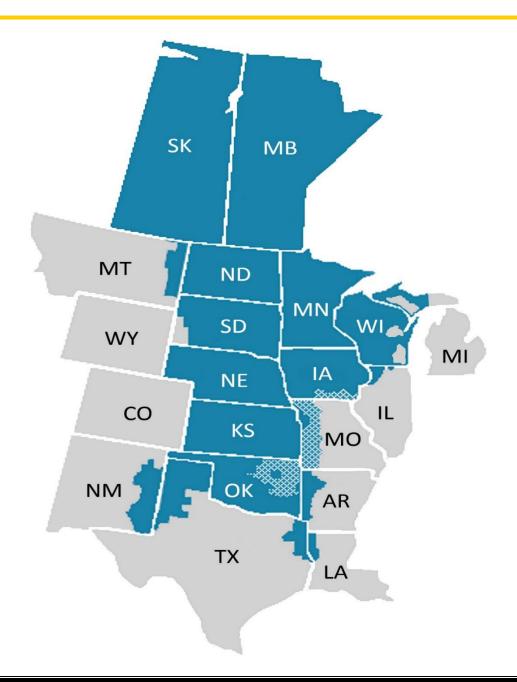
The following table shows funding sources and related expenses for the Finance and Accounting Program.

FINANCE and ACCOUNTING												
		2022 Budget		2022 Projection	202 v 2022	ariance 2 Budget 2 Projection er(Under)		2023 Budget	v	Variance 023 Budget 2022 Budget Over(Under)		
unding												
ERO Funding	,		\$		\$		4		¢			
NERC Assessments Penalties Released	\$	-	Ş	-	Þ	-	\$	-	\$	-		
otal Funding (A)	\$	<u> </u>	\$		\$		\$		\$	-		
xpenses												
Personnel Expenses												
Salaries	\$	606,220	\$	606,220	\$	-	\$	576,825	\$	(29,39		
Payroll Taxes		37,423		37,423		-		34,733		(2,69		
Benefits		74,578		74,578		-		64,779		(9,79		
Retirement Costs		111,583		111,583		-		101,703		(9,880		
Total Personnel Expenses	\$	829,803	\$	829,803	\$	-	\$	778,039	\$	(51,76		
Meeting Expenses												
Meetings	\$	1,000	\$	1,000	\$	-	\$	1,000	\$	-		
Travel		5,000		5,000		-		5,000		-		
Total Meeting Expenses	\$	6,000	\$	6,000	\$	-	\$	6,000	\$	-		
Operating Expenses												
Consultants & Contracts	\$	53,850	\$	53,850	\$	-	\$	61,000	\$	7,15		
Office Rent		1,132,100		1,132,100		-		-		(1,132,10		
Office Costs		249,200		249,200		-		217,800		(31,40		
Professional Services Miscellaneous		59,000 -		59,000 -		-		56,000 -		(3,00		
Total Operating Expenses	\$	1,494,150	\$	1,494,150	\$	-	\$	334,800	\$	(1,159,35		
Other Non-Operating Expenses	\$		\$		\$		\$		\$	-		
Indirect Expenses	\$	(2,329,953)	\$	(2,329,953)	\$		\$	(1,118,839)	\$	1,211,11		
·		(2,323,333)		(2,323,333)				(1,110,033)		1,211,11		
otal Expenses (B)	<u>\$</u>	-	\$		\$	-	\$	<del>-</del>	\$	-		
Change in Net Assets (=A - B)	\$	<del>-</del>	\$		\$	-	\$	<u> </u>	\$	-		
ixed Asset Additions, excluding Right of Use Assets		-		-		-		-		-		
Allocation of Fixed Assets		-	\$	-		-		<u>-</u>		-		
nc(Dec) in Fixed Assets ( C )	\$		\$		\$		\$		\$			
OTAL BUDGET (Total Expenses plus Fixed Asset Additions =B + C)	\$	-	\$	-	\$	-	\$	-	\$	-		
OTAL CHANGE IN RESERVES (=A-B-C)	\$	-	\$	-	\$	-	\$	<u> </u>	\$	-		

Table A-21. Finance and Accounting Budget Detail

# **Section B – Supplemental Financial Information**

2023 Business Plan and Budget



## Section B - Supplemental Financial Information

Reserve Balance

Table B-1 analyzes the reserve for 2022 through 2023.

	Reserve Analy	sis 2021-2023		
	Total	Working Capital	30-Day	Assessment Stabilization
	Reserves	Reserves	Reserves	Reserves (ASR)
Beginning, January 1,2021	8,512,161	5,904,677.00		2,607,484
Plus: Penalty Sanctions <sup>1</sup>	517,497			517,497
Plus: Release from ASR	-	(1,500,000.00)		1,500,000
Plus: 2021 Assessments	16,983,251	16,983,251.00		
Adjustment for targeted 30-day reserves		(1,513,332.00)	1,513,332.00	
Less: 2021 Projected Expenditures	(17,634,982)	(17,634,982.00)		
Final Reserves December 31, 2021	8,377,927	2,239,614	1,513,332	4,624,981
Beginning, January 1, 2022	8,377,927	2,239,614	1,513,332	4,624,981
Plus: Penalty Sanctions <sup>1</sup>	273,100	458,250		(185,150)
Plus: Release from ASR	-	1,743,698		(1,743,698)
Plus: 2022 Assessments	17,832,414	17,832,414		
Adjustment for targeted 30-day reserves	,	(156,198)	156,198.12	
Less: 2022 Projected Expenditures	(20,034,361)	(20,034,361)		
Projected Reserves December 31, 2022	6,449,079	2,083,416	1,669,530	2,696,133
•	, ,	, ,	· · · · ·	, ,
Beginning, January 1, 2023	6,449,079	2,083,416	1,669,530	2,696,133
Plus: Penalty Sanctions 1	-	332,347		(332,347)
Plus: Release from ASR	-	2,242,847		(2,242,847)
Plus: 2023 Assessments	20,507,276	20,507,276		
Adjustment for targeted 30-day reserves		(254,009)	254,008.97	
Less: 2023 Budgeted Expenditures	(23,082,469)	(23,082,469)		
Projected Reserves December 31, 2023	3,873,886	1,829,407	1,923,539	120,940

<sup>1</sup> Penalties collected between July 1 of the previous year through June 30 of the current budget year are released in the following budget year

#### Table B-1. Reserve Analysis 2022 - 2023

#### **Explanation of Significant Variances from 2022**

Per Policy and Procedure 13, MRO's reserves are identified and quantified each year in the Business Plan and Budget. MRO resets its reserves at the beginning of each year. MRO's FAC resolved that a 30-day reserve of cash is sufficient based on MRO's cash flow risk. The FAC and the board determined that the certainty of MRO's funding stream supports the resolution that a 30-day reserve is reasonable for sustaining short-term contingencies.

Policy and Procedure 13 also addresses additional cash-on-hand necessary to meet unplanned, short-term financial needs resulting from changes in the level of expenditures that would adversely affect the company's total annual operating budget during the budget year. The policy combines penalties received and surplus working capital. MRO staff may propose to set aside these funds in a separate reserve account to be released in future periods to mitigate year-over-year variations in assessments. MRO proposes to release \$2,575,194 from assessment stabilization reserves to offset assessment increases.

Breakdown by Statement of Activity Sections

Table B-2 lists all penalties, including date received and amount, received prior to June 30, 2022.

Penalty Sanctions Received On or Prior to June 30, 2022	Date Received	mount eceived	
	Nov-21 Jun-22	\$ 58,828 273,100	
Total Penalties Received		\$ 331,928	

Table B-2. Penalty Sanctions Received

#### **Penalty Sanctions**

All penalties received after July 1, 2021, and prior to June 30, 2022, are listed above, including the amount and date received.

Allocation Method: Penalty sanctions received have been combined with surplus working capital (if any). MRO staff may set aside these funds in a separate reserve account to be released in future budget periods to mitigate year-over-year variations in budget assessments. Assuming no additional penalties are collected, all remaining penalty dollars will be released in the 2023 budget year as part of assessment stabilization. Interest earned on penalties collected will also be added to the total amount released.

Table B-3 lists the budget for Supplemental Funding.

	n By Program (Excluding Penalty		Budget 2022		Projection 2022		Budget 2023		Variance 2023 Budget v 2022 Budget
Reliability Standards									
Interest Income		\$	-	\$	-	\$	5	\$	5
Other			-		-		-		-
	Total	\$	-	\$	-	\$	5	\$	5
Compliance Monitoring, Ent Interest Income Other	forcement & Org. Registration	\$	-	\$	<u>-</u>	\$	269	\$	269
	Total	\$	-	\$	-	\$	269	\$	269
Reliability Assessment and Interest Income Other	Performance Analysis	\$	- -	\$	- -	\$	87 -	\$	87 -
	Total	\$	-	\$	-	\$	87	\$	87
Training and Education Interest Income Other		\$	- -	\$	<u>-</u>	\$	36	\$	36
	Total	\$	-	\$	-	\$	36	\$	36
Situation Awareness and In	frastructure Security								
Interest Income Other		\$	-	\$	-	\$	21	\$	21 -
oo.	Total	\$	-	\$	=	\$	21	\$	21
General and Administrative		•		Φ.		•		Φ.	
Interest Income Other		\$	-	\$	-	\$	-	\$	-
<b>5.1.5.</b>	Total	\$	-	\$	-	\$	-	\$	-
Total O	utside Funding	\$	-	\$	-	\$	419	\$	419

Table B-3. Supplemental Funding

## Explanation of Significant Variances – 2023 Budget versus 2022 Budget

MRO does not earn interest income on general cash held. Interest income on penalties received are held for future budget years. All interest earned is applied to reserves for the reduction of future assessments.

Table B-4 summarizes Personnel Expenses.

Personnel Expenses	Budget 2022		Projection 2022		Budget 2023	Variance 2023 Budget v 2022 Budget	Variance %
Total Salaries	\$ 11,416,562	\$	11,416,562	\$	13,294,284	\$ 1,877,722	16.4%
Total Payroll Taxes	744,165		744,165		863,417	119,252	16.0%
Total Benefits	1,193,996		1,193,996		1,425,181	231,185	19.4%
Total Retirement	1,922,258		1,922,258		2,277,278	355,020	18.5%
Total Personnel Costs	\$ 15,276,980	\$	15,276,980	\$	17,860,160	\$ 2,583,180	16.9%
FTEs	71.00		71.00		78.00	7.00	9.9%
Cost per FTE							
Salaries	160,797	\$	160,797	\$	170,440	9,643	6.0%
Payroll Taxes	10,481	·	10,481	·	11,069	588	5.6%
Benefits	16,817		16,817		18,272	1,455	8.7%
Retirement	27,074		27,074		29,196	2,122	7.8%
Total Cost per FTE	\$ 215,169	\$	215,169	\$	228,976	\$ 13,808	6.4%

Table B-4. Personnel Expenses

#### Personnel Expenses (Increase \$2.6M, 16.9%)

The following assumptions were used to determine the 2023 MRO budget:

- Total personnel expenses were increased to include the addition of 7 FTEs to support the statutory and administrative programs.
- Average salary increases werebudgeted at 3 percent with an additional 1.5 percent in promotion, equity, and market adjustments. Benefit costs are projected to increase by 12 percent.

Table B-5 lists the budget for Meeting Expenses.

Meeting Expenses	Budget 2022		Projection 2022	Budget 2023	Variance 2023 Budget v 2022 Budget	Variance %
Meeting Expenses Travel	\$ 178,877 581,670	\$ \$	178,877 581,670	\$ 178,877 581,670	\$ - -	0.0% 0.0%
Total Meeting Expenses	\$ 760,547	\$	760,547	\$ 760,547	\$ -	0.0%

Table B-5. Meeting Expenses

#### **Meeting Expenses**

Meeting expenses remain flat and reflects increased use of virtual meetings.

#### **Travel Expenses**

Travel expenses remain flat for both staff travel and member reimbursement. Travel dollars for participation on ERO collaboration groups, the Align project, and member travel for organizational group face-to-face meetings trended very low in prior years and it is anticipated that there will be a slow return to travel as pandemic restrictions ease. These costs will not be as high as in prior years, as MRO has adopted a hybrid approach of virtual and in-person meetings. The increased use of virtual technology is a key factor for maintaining low costs.

Table B-6 lists the budget for Consultants and Contracts.

				Variance	
	Budget	Projection	_	_	
Consultants	2022	2022	2023	2022 Budget	%
Consultants					
Reliability Standards	\$ 	\$ -	\$ -	\$ -	
Compliance	165,000	165,000	130,000	(35,000)	-21%
Reliability Analysis and Organization Registration and Certification	-	-	-	-	
Training and Education	-	-	-	-	
Situation Awareness and Infrastructure Security	-	-	-	-	
General and Administrative	65,000	65,000	80,000	15,000	23%
Legal	54,900	54,900	54,900	-	0%
Information Technology	165,200	165,200	165,200	-	0%
Human Resources	-	-	-	-	
Accounting and Finance	 7,500	7,500	9,000	1,500	20%
Consultants Total	\$ 457,600	\$ 457,600	\$ 439,100	\$ (18,500)	-4%

Contracts	Budget 2022	Projection 2022	Budget 2023	Variance 2023 Budget v 2022 Budget	
Contracts					
Reliability Standards	\$ -	\$ -	\$ -	\$ -	
Compliance	218,382	218,382	218,382	-	0%
Reliability Analysis and Organization Registration and Certification	71,100	71,100	41,100	(30,000)	-42%
Event Analysis	-	-	-	-	
Training and Education	-	-	-	-	
Situation Awareness and Infrastructure Security	-	-	-	-	
Committee and Member Forums	-	-	-	-	
General and Administrative	-	-	-	-	
Legal	-	-	-	-	
Information Technology	384,368	384,368	505,436	121,068	31%
Human Resources	27,000	27,000	125,000	98,000	363%
Accounting and Finance	46,350	46,350	52,000	5,650	12%
Contracts Total	\$ 747,200	\$ 747,200	\$ 941,918	\$ 194,718	26%

Table B-6. Consultants and Contracts

#### Consultants for Compliance (Decrease \$35K, 21%)

Consultants used in the compliance area were historically budgeted toperform CMEP activities in case staffing levels were not adequate to perform delegated work. MRO is projecting a decreased need for consultants in 2023. The scope of consulting work for compliance in the 2023 BP&B is to seek outside expertise in process efficiencies around the new Align tool.

#### Consultants for General and Administrative (Increase \$15K, 23%)

The increase in this area includes recruiter fees for independent director search fees due to scheduled seat vacancies in 2023.

#### Contracts for Reliability Analysis (Decrease \$30K, 42%)

Contracts consist of external modeling software that is being discontinued. New software will be managed by MRO's Information Technology Department. Internal staff will coordinate with external technical support for this software.

#### **Contracts for Information Technology (Increase \$121K, 31%)**

This increase is due to contract costs for new security software, applications, and data analytics. It also includes a modeling software contract previously managed by the Reliability Analysis Department.

## Contracts for Human Resources (Increase \$98K, 363%)

Human resource contracts consist primarily of the engagement of recruiting firms to source specialized candidates with bulk power system or related engineering and security expertise.

Table B-7 lists the budget for Office Rent.

Office Rent	Budget 2022	Projection 2022	Budget 2023	2	Variance 2023 Budget v 2022 Budget	
Office Rent	\$ 1,086,100	\$ 1,086,100	\$ 1,000,000	\$	(86,100)	-7.9%
Utilities	11,000	\$ 11,000	11,000		-	0.0%
Maintenance	35,000	\$ 35,000	35,000		-	0.0%
Total Office Rent	\$ 1,132,100	\$ 1,132,100	\$ 1,046,000	\$	(86,100)	-7.61%

Table B-7. Office Rent

Rent is lower due to adjusted occupancy costs from prior years and anticipated adjustments resulting from the adoption of new accounting standards for leases.

Table B-8 lists the budget for Office Costs.

Office Costs	Budget 2022	Projection 2022	Budget 2023	Variance 2023 Budget v 2022 Budget	Variance %
Phone Service					
Data Circuit (qmoe)	\$ 60,000	\$ 60,000	\$ 60,000	\$ -	0.00%
Webex	19,200	19,200	30,000	10,800	56.25%
Voice Circuits	18,000	18,000	18,000	-	0.00%
Business Cable	3,250	3,250	3,250	-	0.00%
Disaster Recovery Site	-	-	-	-	
Internet/Cell	63,854	63,854	117,030	53,176	83.28%
Office Supplies	36,700	36,700	36,700	-	0.00%
Employee Member Events	34,000	34,000	39,000	5,000	14.71%
Employee Related Expense	27,400	27,400	30,900	3,500	12.77%
Computer Supplies and Maintenance	138,500	138,500	180,500	42,000	30.32%
Publications & Subscriptions	23,675	23,675	26,525	2,850	12.04%
Professional Dues	23,560	23,560	27,489	3,929	16.68%
Postage	4,200	4,200	3,200	(1,000)	-23.81%
Temporary Services	55,000	55,000	55,000	-	0.00%
Finance-Filing/Reg Fees	4,400	4,400	4,400	-	0.00%
Equipment Repair/Service Contracts	39,000	39,000	39,000	-	0.00%
Bank Charges	20,000	20,000	20,000	-	0.00%
Presentation, Publicity, & Supplies Promotional	25,000	25,000	25,000	-	0.00%
Departmental Functional Training	282,195	282,195	328,750	46,555	16.50%
Insurance Expense	90,000	90,000	110,000	20,000	22.22%
Total Office Costs	\$ 967,934	\$ 967,934	\$ 1,154,744	\$ 186,810	19.30%

Table B-8. Office Costs

# Explanation of Significant Variances – 2023 Budget versus 2022 Budget (Increase \$187K, 19.3%)

The increase in Office Costs is primarily the result of seven additional FTEs. This is reflected in functional training, computer supplies and maintenance, internet/cell phone, and WebEx license expenses. Adding to this increase is the expected rise in cyber liability insurance premiums as a result of the rise in cyber crime across the country.

Table B-9 lists the budget for Professional Services.

Professional Services		Budget 2022		Projection 2022		Budget 2023		Variance 023 Budget v 2022 Budget	Variance %
	•	000 500	•	000 500	•	400 500	•	400.000	00.000/
Independent Trustee Fees	\$	330,500	\$	330,500	\$	430,500	\$	100,000	30.26%
Independent Trustee Travel Reimbursement		30,000		30,000		30,000		-	0.00%
Outside Legal		100,000		100,000		100,000		-	0.00%
Branding and Videography		47,500				15,000		(32,500)	-68.42%
Accounting and Auditing Fees		36,000		36,000		36,000		-	0.00%
Actuarial Fees		23,000		23,000		20,000		(3,000)	-13.04%
Total Services	\$	567,000	\$	519,500	\$	631,500	\$	64,500	11.38%

Table B-9. Professional Services

This increase includes recruiter fees for an independent director search due to scheduled seat vacancies in 2023.

Table B-10 lists the budget for Miscellaneous.

Miscellaneous Expenses	Budget 2022	Projection 2022	Budget 2023	Variance 2023 Budget v 2022 Budget	Variance %
	\$ -	\$ -	\$ -	\$ -	
		-		-	
	-	-	-	-	
Total Miscellaneous Expenses	\$ -	\$ -	\$ -	\$ -	0.00%

Table B-10. Miscellaneous

# Explanation of Significant Variances – 2023 Budget versus 2022 Budget MRO has not budgeted any Miscellaneous Expenses in 2023.

Table B-11 lists the budget for other Non-Operating Expenses.

Other Non-Operating Expenses	Budget 2022	Projection 2022	Budget 2023	Variance 2023 Budget v 2022 Budget	
Interest Expense	\$ _	\$ _	\$ _	\$ _	
Line of Credit Payment		-		-	
Office Relocation	-	-	-	-	
Total Non-Operating Expenses	\$ -	\$ -	\$ -	\$ <u>-</u>	0.00%

Table B-11. Other Non-Operating Expenses

# Explanation of Significant Variances – 2023 Budget versus 2022 Budget MRO has not budgeted any Non-Operating Expenses in 2023.

Table B-12 lists the budget for Fixed Assets.

Fixed Assets	Budget 2022	Projection 2022	Budget 2023	Variance 2023 Budget v 2022 Budget	
Computer Equipment	125,000	125,000	248,500	123,500	98.8%
Capitalized Software	-	-		-	
Furniture and Equipment	-	-	-	-	
Leasehold Improvements	-	-	-	-	
Total Change in Fixed Assets	\$ 125,000	\$ 125,000	\$ 248,500	\$ 123,500	98.8%

Table B-12. Fixed Assets

MRO's capital asset costs average \$250K per year for the replacement of end-of life assets. MRO experienced an office expansion in 2020-2021 that included \$125K towards the replacement of end-of-life capital assets scheduled for 2022. Leaving the remainder of those costs fulfilled in 2022 at \$125K. The budgeted 2023 capital assets return to normal at the \$250K level for the replacement of end-of-life assets scheduled for 2023.

Table B-13 compares the 2023 budget with projections for 2024 - 2025.

Statement of Activities, Fixed Assets E 2024-207		rojections									
		2023 Budget		2024 Projection		\$ Change 23 v 24	% Change 23 v 24	2025 Projection		\$ Change 24 v 25	% Change 24 v 25
unding											
ERO Funding											
NERC Assessments	\$	20,507,276	\$	23,583,367	\$	3,076,091	15.00% \$	26,885,038	\$	3,301,671	14.00
Assessment Stabilization Reserves Membership Dues		2,575,194		120,940		(2,454,254)	-95.30%	-		-	
Testing Fees						-				_	
Services & Software						-				-	
Workshop Fees & Miscellaneous						-				-	
Interest & Investment Income						<u> </u>					
otal Funding (A)	\$	23,082,469	\$	23,704,307	\$	621,837	2.7% \$	26,885,038	\$	3,301,671	
penses											
Personnel Expenses											
Salaries	\$	13,294,284	\$	14,712,343	\$	1,418,059	10.7% \$	15,655,352	\$	943,009	6.4
Payroll Taxes		863,417		955,803		92,386	10.7%	1,016,974		61,171	6.4
Benefits Decimal Control		1,425,181		1,596,203		171,022	12.0%	1,739,861		143,658	9.0
Retirement Costs Total Personnel Expenses	ć	2,277,278 <b>17,860,160</b>	Ś	2,550,552 19,814,900	Ś	273,273 1,954,740	12.0% 10.9% \$	2,805,607 <b>21,217,794</b>	Ś	255,055 <b>1,402,894</b>	10.
Total Personner Expenses	Ą	17,000,100	Ą	15,614,500	ş	1,334,740	10.5% 3	21,217,734	Ą	1,402,034	
Meeting Expenses											
Meetings & Conference Calls	\$	178,877	\$	186,032		7,155	4.0% \$	193,473		7,441	4.0
Travel Total Meeting Expenses	\$	581,670 <b>760,547</b>	ć	604,937 <b>790,969</b>	Ś	23,267 <b>30,422</b>	4.0% <b>4.0%</b> \$	629,134 <b>822,608</b>	ć	24,197 <b>31,639</b>	4.0
Total Meeting Expenses	7	700,547	7	730,303	Υ	30,422	4.0% \$	022,000	7	31,033	
Operating Expenses, excluding Depreciation											
Consultants & Contracts	\$	1,381,018	\$	1,450,069		69,051	5.0% \$	1,508,072		58,003	4.
Office Rent		1,046,000	•	1,077,380		31,380	3.0% \$	1,120,475		43,095	4.0
Office Costs Professional Services		1,154,744		1,212,481		57,737	5.0% \$	1,260,980		48,499	4. 4.
Miscellaneous		631,500		650,445		18,945	3.0% \$	676,463		26,018	4.0
Total Operating Expenses	\$	4,213,262	\$	4,390,375	\$	177,113	4.2% \$	4,565,990	\$	175,615	
								,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,			
Other Non-Operating Expenses	\$	-	\$	•		-	\$	-		•	
Indirect Expenses	\$	-	\$	-		-	\$	-		-	
otal Expenses (B)	\$	22,833,969		24,996,244		2,162,275	9.5%	26,606,392		1,610,147	
hange in Net Assets (=A - B)	\$	248,500	\$	(1,291,938)		(1,540,438)	-619.9% \$	278,647		1,691,524	
						7	•				
xed Asset Additions, excluding Right of Use Assets (C)	\$	248,500	Ş	250,000	Ş	1,500	0.6% \$	250,000	Ş	250,000	
DTAL BUDGET (Total Expenses plus Fixed Asset Additions =B + C)	\$	23,082,469	\$	25,246,244	\$	2,163,775	9.4% \$	26,856,392	\$	1,860,147	6.
OTAL CHANGE IN RESERVES (=A-B-C)	\$	-	\$	(1,541,938)	\$	-	\$	28,647			

Table B-13. Budget 2023 Compared with 2024-2025 Projections

#### **Explanation of 2024-2025 Projections**

MRO has a strategic plan that addresses resource changes resulting from the implementation of the Align tool, increased risk focus in cyber and infrastructure security, and stakeholder and industry outreach.

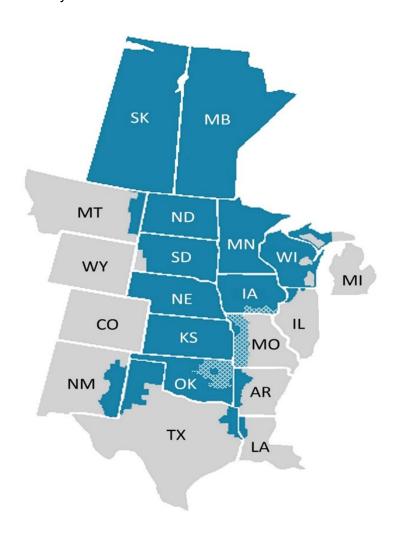
- FTEs increase by seven year-over-year
- Meeting expenses increase four percent year-over-year
- Four percent escalation rate applied to operating expense categories
- Total budget increase of \$2.2MK in 2024
- Total budget increase of \$1.9M in 2025
- Zero penalties budgeted

# **Section C – Non-Statutory Activities**

# 2023 Business Plan and Budget

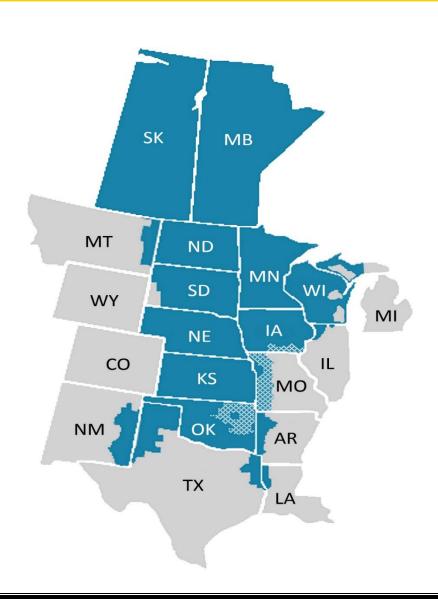
## **Section C – Non-Statutory Activities**

2023 Non-Statutory Business Plan and Budget MRO has no non-statutory activities.



# Section D – Additional Consolidated Financial Statements

2023 Business Plan and Budget



## Section D – Additional Consolidated Financial Statements

2023 Consolidated Statement of Activities by Program, Statutory and Non-Statutory

				Reliability Analysis and	I	Functions in Delegation Agr	reement					
				Organization								
				Registration and		Situation Awareness and						
Statement of Activities and Capital Expenditures by Program		Reliability Standards		Certification	Training and Education	Infrastructure Security	Committee and	General and				Accounting and
2023 Business Plan and Budget	Statutory Total	(Section 300)	Compliance (Section 400)	(Section 800 & 500)	(Section 600&900)	(Section 1000)	Member Forums	Administrative	Legal and Regulatory	Information Technology	Human Resources	Finance
Funding												
ERO Funding								(0.040.047)				
NERC Assessments Assessment Stabilization Adjustment	20,507,276 331,928	233,286 3,605	14,706,986 213,464	4,777,509 69,075	1,921,873 28,901	1,110,468 16,883		(2,242,847)				
Membership Dues	331,320	3,003	213,404	09,073	20,501	10,005						
Testing Fees												
Services & Software												
Workshops & Miscellaneous Revenue	_											
Interest & Investment Income	419	5	269	87	36	21						
Total Funding (A)	20,839,623	236,896	14,920,720	4,846,672	1,950,810	1,127,372		(2,242,847)				
Expenses												
Personnel Expenses												
Salaries	13,294,284	98,403	6,323,947	2,101,041	765,029	464,895		908,838	591,987	1,187,790	275,529	576,825
Payroll Taxes	863,417	6,424	427,795	139,972	52,590	30,578	-	33,958	33,224	85,342	18,801	34,733
Benefits	1,425,181	11,598	685,082	217,524	89,316	54,105	-	49,320	48,952	167,699	36,806	64,779
Retirement Costs	2,277,278	17,792	1,093,595	352,240	131,338	83,501		117,584	90,199	236,004	53,322	101,703
Total Personnel Expenses	17,860,160	134,217	8,530,420	2,810,777	1,038,273	633,079	-	1,109,700	764,363	1,676,834	384,458	778,039
Meeting Expenses												
Meetings	178.877	1.400	11,500	9,000	90,000	4.277		60,000	500	1,200		1.000
Travel	581,670	6,500	224,470	127,600	50,500	30,500		110,300	19,800	5,000	2,000	5,000
Total Meeting Expenses	760,547	7,900	235,970	136,600	140,500	34,777		170,300	20,300	6,200	2,000	6,000
Operating Expenses												
Consultants & Contracts	1,381,018		348,382	41,100				80,000	54,900	670,636	125,000	61,000
Office Rent	1,046,000	-					-	1,046,000	-			-
Office Costs	1,154,744		194,430	42,350	12,300	15,710	-	130,650	39,529	369,650	132,325	217,800
Professional Services	631,500							460,500	115,000		-	56,000
Miscellaneous	4,213,262		542,812	83,450	12,300	15,710	-		209,429		257,325	
Total Operating Expenses	4,213,262	-	542,812	83,450	12,300	15,/10		1,717,150	209,429	1,040,286	257,325	334,800
Total Direct Expenses	22,833,969	142,117	9,309,202	3,030,827	1,191,073	683,566		2,997,150	994,092	2,723,320	643,783	1,118,839
Indirect Expenses	-	92,080	5,451,707	1,764,131	738,100	431,167		(2,997,150)	(994,092)	(2,723,320)	(643,783)	(1,118,839)
		•										
Other Non-Operating Expenses	<del></del>							-	-	-	-	
Total Expenses (B)	22,833,969	234,196	14,760,908	4,794,958	1,929,173	1,114,733		-	-	-	-	-
Change in Net Assets	(1,994,347)	2,699	159,811	51,714	21,637	12,639		(2,242,847)		-		
•			·									
Fixed Assets												
Computer & Software CapEx Furniture & Fixtures CapEx	248,500									248,500		
Equipment CapEx												
Leasehold Improvements												
Leasenoid improvements	•										•	
Allocation of Fixed Assets	0	2,699	159,811	51,714	21,637	12,639				(248,500)		
	248,500											
Inc(Dec) in Fixed Assets ( C )	248,500	2,699	159,811	51,714	21,637	12,639	-	-	-	<u> </u>	-	<u>-</u> _
TOTAL BUDGET (Total Expenses plus Fixed Asset Additions =B + C)	23,082,469	236,896	14,920,720	4,846,672	1,950,810	1,127,372		-	-	-	-	-
TOTAL CHANGE IN WORKING CAPITAL (=A-B-C)	(2,242,847)	0	(0)	0	(0)	0		(2,242,847)				
FTEs	78.00	0.63	37.30	12.07	5.05	2.95		2.68	2.66	9.14	2.00	3.52

Table D-1. Consolidated Statement of Activities by Program, Statutory and Non-Statutory

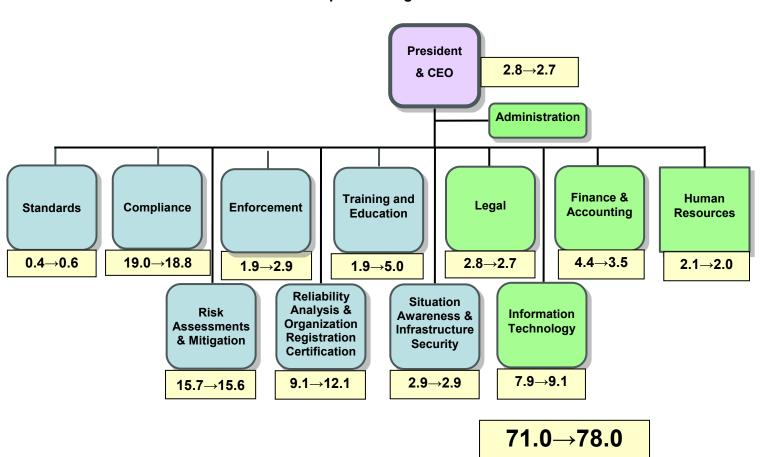
Table D-2. Three-Year Comparison

## Appendix A

**Organization Chart** 

The MRO Organization Chart is shown below.

# 2022 to 2023 Full Time Equivalent (FTE) Comparison Organization Chart



#### FTE Trend from 2021 to 2025

2021	2022	2023	2024 Estimate	2025 Estimate
66.0	71.0	78.0	83.0	85.0

Figure 2. Organization Chart and FTE Trend

## Appendix B

This section lists acronyms used in this document.

Acronym	Definition
ASR	Assessment Stabilization Reserve
BES	Bulk Electric System
BPS	Bulk Power System
CMEP	Compliance Monitoring and Enforcement Program
CMEPAC	Compliance Monitoring and Enforcement Program Advisory Council
COP	Compliance Oversight Plan
DADS	Demand Response Availability Data System
E-ISAC	Electricity Information Sharing and Analysis Center
ERAG	Eastern Interconnection Reliability Assessment Group
ERO	Electric Reliability Organization
FAC	Finance and Audit Committee
FERC	Federal Energy Regulatory Commission
FPA	Federal Power Act
FTE	Full-Time Equivalent
GAAP	Generally Accepted Accounting Principles
GADS	Generating Availability Data System
GPC	Governance & Personnel Committee
HERO	Highly Effective Reliability Organization
HRO	Highly Reliable Organization
IRA	Inherent Risk Assessment
IT	Information Technology
MRO	Midwest Reliability Organization
NEL	Net-Energy-for-Load
NERC	North American Electric Reliability Corporation
OGOC	Organizational Group Oversight Committee
RAC	Reliability Advisory Council
RAM	Risk Assessment and Mitigation
RE	Regional Entity
RISC	Reliability Issues Steering Committee
SAC	Security Advisory Council

SAG	Standard Application Guide
SOA	Statement of Activities
TADS	Transmission Availability Data System

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