

# Standards, Compliance, and Enforcement Bulletin

April 17–23, 2023

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## ACTIVE STANDARDS POSTINGS

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

Project	Action	Start Date	End Date
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### Join Ballot Pools

Project	Action	Start Date	End Date
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### Posted for Comment

Project	Action	Start Date	End Date
<a href="#">Texas Reliability Entity, Regional Standard Development Process</a>	<a href="#">Comment Period</a>	03/08/23	04/21/23
<a href="#">Project 2023-03 – Internal Network Security Monitoring (INSM)</a>   SAR	<a href="#">Comment Period</a>	04/06/23	05/05/23

<b>NEW</b> <a href="#">Project 2022-02 – Modifications to TPL-001 and MOD-032</a>   SAR	<a href="#">Comment Period</a>	04/13/23	05/12/23
<a href="#">Project 2023-04 – Modifications to CIP-003</a>   SAR	<a href="#">Comment Period</a>	03/31/23	05/15/23
<b>NEW</b> <a href="#">2023 Standard Processes Manual Revisions to Address SPSEG Recommendations</a>   Draft 2	<a href="#">Comment Period</a>	04/13/23	05/30/23

### Posted for Comment

Posting	Action	Start Date	End Date
<p><b>Comment Period Open for Draft Reliability Guideline:</b> <a href="#">Draft Reliability Guideline: Operating Reserve Management - Version 4</a> is intended to provide recommended practices for the management of an appropriate mix of Operating Reserve as well as readiness to respond to loss of load events. It also provides guidance with respect to the management of Operating Reserve required to meet the NERC Reliability Standards.</p> <p>Reliability guidelines are not binding norms or parameters nor are they Reliability Standards; however, NERC encourages entities to review, validate, adjust, and/or develop a program with the practices set forth in this guideline. Entities should review this guideline in detail and in conjunction with evaluations of their internal processes and procedures; these reviews could highlight that appropriate changes are needed, and these changes should be done with consideration of system design, configuration, and business practices.</p> <p>The Reliability and Security Technical Committee (RSTC) approved posting for 45-day industry comment period. A draft version of the guideline has been posted on the <a href="#">Reliability Guidelines, Security Guidelines, Technical Reference Documents, and White Papers</a> page.</p>	Submit comments via email using the <a href="#">comment form</a> .	03/06/23	04/20/23
<p><b>Comment Period Open for Draft White Paper:</b> Energy reliability assessments are critical for assuring the reliable operation of the BPS as the penetrations of variable generation resources and/or just-in-time energy supplies increase. In</p>	Submit comments via email using the <a href="#">comment form</a> .	03/07/23	04/21/23

<p>turn, dispatchable and quick start units are relied upon for flexibility, where sources such as energy storage and natural gas-fired generation deliver energy to support intra-hour and inter-hour ramping to match variations in demand and energy production from the rest of the fleet. Energy reliability assessments account for the finite nature of stored fuels and their replenishment characteristics. In addition, the availability of natural gas to supply electric generation can impact reliability during high natural gas demand periods throughout the year. Energy reliability assessments provide assurance to planners and operators that resources can supply both electrical energy and ancillary services needs across a span of time.</p> <p>The purpose of the <a href="#">Considerations for Performing an Energy Reliability Assessment</a> draft white paper is to clarify what an energy reliability assessment is and recommend elements for consideration when performing an assessment. The paper is being posting for 45-day industry comment period. A draft version of the White Paper has been posted on the <a href="#">Reliability Guidelines, Security Guidelines, Technical Reference Documents, and White Papers</a> page.</p>			
<p><b>Comment Period Open for Draft Reliability Guideline:</b> The <a href="#">Draft Reliability Guideline: Integrating Reporting ACE with the NERC Reliability Standards</a> is intended to provide recommended practices for calculating and using Reporting Area Control Error (ACE) in a Tie Line Bias (TLB) control program integrated with the NERC Reliability Standards.</p> <p>The RSTC approved posting for 45-day industry comment period. A draft version of the guideline has been posted on the <a href="#">Reliability Guidelines, Security Guidelines, Technical Reference Documents, and White Papers</a> page.</p>	<p>Submit comments using the <a href="#">comment form</a>.</p>	<p>03/13/23</p>	<p>04/27/23</p>
<p><b>Comment Period Open for Draft Reliability Guideline:</b> The <a href="#">Draft Reliability Guideline: Primary Frequency Control</a> provides recommendations to the industry for frequency control, covering governor deadband and governor droop settings that can enable generating resources (synchronous, inverter-based, and other</p>	<p>Submit comments using the <a href="#">comment form</a>.</p>	<p>03/22/23</p>	<p>05/06/23</p>

<p>technologies) to provide needed primary frequency response (PFR) to the Interconnection.</p> <p>The RSTC approved posting for 45-day industry comment period. A draft version of the guideline has been posted on the <a href="#">Reliability Guidelines, Security Guidelines, Technical Reference Documents, and White Papers</a> page.</p>			
<p><b>Comment Period Open for Version 5.0 of Draft ERO Event Analysis Process Document and Appendices:</b> In an effort to continually improve the ERO Event Analysis Process and Appendices (EAP) the NERC Event Analysis Subcommittee (EAS) periodically reviews the EAP for any required revisions and edits. The RSTC approved to post these documents for a 45-day comment period to gather feedback from industry. <a href="#">ERO Event Analysis Process Document – Version 5.0 – REDLINE</a>   <a href="#">ERO Event Analysis Process Document – Version 5.0 – CLEAN</a>   <a href="#">ERO Event Analysis Process Document – Appendices – Version 5.0 – REDLINE</a>   <a href="#">ERO Event Analysis Process Document – Appendices – Version 5.0 – CLEAN</a></p>	<p>Submit comments to <a href="#">Brad Gordon</a> using the <a href="#">comment form</a>.</p>	<p>04/05/23</p>	<p>05/19/23</p>

**STANDARDS NEWS**

**NEW Initial Ballots and Non-binding Poll Results for Project 2021-07 – Extreme Cold Weather Grid Operations, Preparedness, and Coordination**

The initial ballots and non-binding polls of the associated Violation Risk Factors and Violation Severity Levels concluded at **8 p.m. Eastern, April 13, 2023** for the following standards and implementation plan:

- EOP-011-4 – Emergency Operations
- TOP-002-5 – Operations Planning
- Implementation Plan

The voting statistics are listed below, and the details can be accessed on the [Ballot Results](#) page. The drafting team will review all responses received during the comment period and determine the next steps of the project.

	<b>Ballot</b>	<b>Non-binding Poll</b>
<b>Standard</b>	<b>Quorum / Approval</b>	<b>Quorum / Supportive Opinions</b>
EOP-011-4	89.32% / 45.64%	88.56% / 47.06%
TOP-002-5	89.29% / 44.59%	87.73% / 47.49%
Implementation Plan	89.25% / 44.62%	

**Quick Links**

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

## GENERAL COMPLIANCE AND ENFORCEMENT NEWS

There is no additional Compliance and Enforcement news to report for this week.

### Quick Links

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

## OTHER NEWS

### **NEW Cross-Sector Collaboration: Addressing the Potential Challenges from Electric Vehicle Grid Impacts**

The [California Mobility Center \(CMC\)](#), the [North American Electric Reliability Corporation \(NERC\)](#), and the [Western Electricity Coordinating Council \(WECC\)](#) developed the joint report, “[Electric Vehicle Dynamic Charging Performance Characteristics during Bulk Power System Disturbances](#)” to highlight the need for ongoing collaboration between electric utilities, electric vehicles (EVs), and electric vehicle equipment industries to ensure electric system reliability.

The report, undertaken as part of the joint [EV Grid Reliability Working Group](#), focuses on EV charging behavior during infrequent disturbances that originate from the high-voltage bulk power system. These events last no more than a few seconds, but if left unchecked they have the potential to cause catastrophic consequences for electric system reliability such as cascading blackouts and widespread power interruptions. For more information, please see the [full announcement](#).

**STANDARDS SUBJECT TO FUTURE ENFORCEMENT**

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

<b>U.S. Effective Dates for Reliability Standards</b>	
<b>U.S. Effective Date</b>	<b>Standard(s)</b>
<b>July 1, 2023</b>	<a href="#">TPL-001-5.1 – Transmission System Planning Performance Requirements</a>   <a href="#">Implementation Plan</a>
<b>January 1, 2024</b>	<a href="#">CIP-004-7 – Cyber Security – Personnel &amp; Training</a>
	<a href="#">CIP-011-3 – Cyber Security - Information Protection</a>
	<a href="#">FAC-001-4 – Facility Interconnection Requirements</a>   <a href="#">Implementation Plan</a>
	<a href="#">FAC-002-4 – Facility Interconnection Studies</a>   <a href="#">Implementation Plan</a>
<b>April 1, 2024</b>	<a href="#">TPL-007-4 – Transmission System Planned Performance for Geomagnetic Disturbance Events (Requirements R7, 7.1–7.3, 7.3.1–7.3.2, 7.4, 7.4.1–7.4.3, 7.5, 7.5.1., R11, 11.1–11.3, 11.3.1–11.3.2, 11.4, 11.4.1–11.4.3, 11.5, and 11.5.1)</a>
	<a href="#">FAC-003-5 – Transmission Vegetation Management</a>
	<a href="#">FAC-011-4 – System Operating Limits Methodology for the Operations Horizon</a>
	<a href="#">FAC-014-3 – Establish and Communicate System Operating Limits</a>
	<a href="#">IRO-008-3 – Reliability Coordinator Operational Analyses and Real-time Assessments</a>
	<b>NEWLY ADDED</b> <a href="#">PRC-002-4 – Disturbance Monitoring and Reporting Requirements</a>
	<a href="#">PRC-023-5 – Transmission Relay Loadability</a>   <a href="#">Implementation Plan</a>
<a href="#">PRC-026-2 – Relay Performance During Stable Power Swings</a>   <a href="#">Implementation Plan</a>	
<b>October 1, 2024</b>	<a href="#">TOP-001-6 – Transmission Operations</a>
	<a href="#">EOP-012-1 – Extreme Cold Weather Preparedness and Operations</a> (Requirements 1–2 effective 4/1/28; Requirement 4 effective 10/1/29)
<b>April 1, 2026</b>	<b>NEWLY ADDED</b> <a href="#">CIP-003-9 - Cyber Security — Security Management Controls</a>

## BOARD OF TRUSTEES AND FERC ACTION

### **NEW NERC Announces Actions Addressing Physical Security**

On April 14, 2023, NERC filed its [report](#) evaluating the CIP-014 Reliability Standard with FERC. The report, which was directed by FERC in a December 15, 2022 order, called for NERC to study the applicability criteria of the standard and the adequacy of the risk assessment and to assess whether a minimum level of physical security protections should be established for all bulk power system transmission stations, substations, and primary control centers.

“This evaluation was important given the heightened physical security threat environment and the high profile attacks which occurred in the fourth quarter of 2022. Our study outlines actions to strengthen the physical security standard and foster robust stakeholder engagement to consider additional risk-based enhancements,” said Jim Robb, NERC president and CEO. “Following recent events, industry and the E-ISAC developed and shared a physical security resource guide that detailed broader considerations in developing a physical security approach for all assets beyond those identified as critical by CIP-014. The actions outlined in our report will help further secure critical bulk power system assets and ensure the foundational protections of CIP-014 are keeping pace with a dynamic risk environment.”

Findings and follow-up actions include:

- **NERC does not recommend expansion of the CIP-014 applicability criteria. NERC will work with FERC staff to hold a technical conference to evaluate whether additional substation configurations should be included in the existing criteria.** Based on available data, NERC found no evidence that expansion of the criteria would identify additional substations as critical. Our review does suggest that additional data and analysis is needed on whether additional substations configurations warrant assessment under CIP-014. A technical conference will identify which substations should be studied and establish data needs on a periodic basis to determine whether they should be included in the applicability criteria.
- **The report finds that the objective of the CIP-014 risk assessment requirement is appropriate, but should be refined to help ensure the assessment are performed using consistently and with the appropriate technical rigor.** To promote consistency, NERC will initiate a standards development project to clarify risk assessment expectations, including for dynamic studies.
- **While NERC is not recommending a common minimum level of physical security protections, NERC finds that, given the increase in physical security attacks on bulk power system substations, there is a need to evaluate additional reliability, resiliency, and security measures designed to mitigate the risks associated with those physical security attacks. NERC will work with FERC staff to hold a technical conference to further study appropriate levels of physical protections.** NERC advocates taking a risk-based approach to determine what level of investment would be appropriate based on local risk factors, regional system configuration, and the asset’s mean



time to recover. The technical conference will gather additional data on protection, response, and resiliency measures and discuss whether and how they could be appropriately incorporated into reliability standards or guidelines.

Reliability standards must keep pace with the rapidly changing challenges facing the bulk power system, and NERC looks forward to continuing its work with FERC and industry to support a secure and reliable North American grid.

### **NEW FERC Issuances**

On April 14, 2023, FERC issued an [order](#) approving proposed Reliability Standard PRC-002-4. You can find all FERC orders for 2023 [here](#).

FERC also released the Sunshine Agenda for its upcoming [April 20, 2023 open meeting](#). There are two items of interest to NERC:

- A-3 – RD23-2-000 - North American Electric Reliability Corporation
  - This item will be a presentation by NERC CEO Jim Robb regarding NERC's [report](#) evaluating the effectiveness of physical security Reliability Standard CIP-014-3. FERC directed NERC to submit this report by [FERC Order](#) dated December 15, 2022.
  
- E-1 – RM22-19-000 Incentives for Advanced Cybersecurity Investment
  - This item pertains to the Notice of Proposed Rulemaking (NOPR) regarding incentives for Advanced Cybersecurity Investment. NERC and the Regional Entities submitted [joint comments](#) regarding incentive-based rate treatments for voluntary cybersecurity investments in November 2022.

## UPCOMING EVENTS

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

### Workshops and Conferences

- **NEW** NATF/EPRI/NERC Transmission Resilience Summit – May 17–18, 2023, Tempe, AZ | [Register](#)
- 2023 Probabilistic Analysis Forum – October 10–12, 2023, Salt Lake City, UT | **Save the Date**
- GridSecCon 2023 – October 17–20, 2023 | **Save the Date**

### Webinars

- **NEW** 2023 Standard Processes Manual Revisions | Draft 2 Informational Webinar – 12:00–1:00 p.m. Eastern, April 18, 2023 | [Register](#)
- **NEW** Project 2020-06 – Verifications of Models and Data for Generators Webinar – 3:00–5:00 p.m. Eastern, April 24, 2023 | [Register](#)
- **NEW** [Reliability Guideline: Electromagnetic Transient \(EMT\) Modeling for BPS-Connected Inverter-Based Resources—Recommended Model Requirements and Verification Practices](#) Webinar – 1:00–2:00 p.m. Eastern, May 16, 2023 | [Register](#)
- ERO Enterprise Facility Rating Management Webinar – 1:00–4:30 p.m. Eastern, May 24, 2023 | [Register](#)

### Standing Committee Meetings and Conference Calls

- **NEW** Standards Committee Meeting – 1:00–3:00 p.m. Eastern, April 19, 2023 | [Register](#) | [Agenda](#)
- Compliance and Certification Committee Meeting – April 26–27, 2023, Austin, TX | [Day 1 Virtual Registration](#) | [Day 1 In-Person Registration](#) | [Day 2 Virtual Registration](#) | [Day 2 In-Person Registration](#)
- Personnel Certification Governance Committee Meeting – 8:00–9:00 a.m. Eastern, May 2, 2023 | [Agenda](#)
- Second Quarter Board of Trustees, Board Committees, and Member Representatives Committee Meetings – May 10–11, 2023 | [Meetings Registration](#) | [Schedule of Events](#)

### Standard Drafting Team Meetings

- Project 2016-02 – Modifications to CIP Standards Drafting Team Meeting – 12:00–2:00 p.m. Eastern, April 17, 2023 | [Register](#)
- Project 2022-03 – Energy Assurance with Energy-Constrained Resources Standard Drafting Team Meeting – 1:30–3:00 p.m. Eastern, April 17, 2023 | [Register](#)
- **NEW** Project 2022-04 – EMT Modeling SAR Drafting Team Meeting – 3:15–5:15 p.m. Eastern, April 17, 2023 | [Register](#)

- **NEW** Project 2021-04 – Modifications to PRC-002 - Phase II Standard Drafting Team Meeting – 11:00 a.m.–3:00 p.m. Eastern, April 18, 2023 | [Register](#)
- Project 2022-03 – Energy Assurance with Energy-Constrained Resources Standard Drafting Team Meeting – 12:30–2:00 p.m. Eastern, April 24, 2023 | [Register](#)
- Project 2016-02 – Modifications to CIP Standards Drafting Team Meeting – 1:00–3:00 p.m. Eastern, April 24, 2023 | [Register](#)
- Project 2016-02 – Modifications to CIP Standards Drafting Team Meeting – 12:00–2:00 p.m. Eastern, April 26, 2023 | [Register](#)
- **NEW** Project 2021-08 – Modifications to FAC-008 Standard Drafting Team Meeting – 2:30–4:30 p.m. Eastern, April 26, 2023 | [Register](#)
- Project 2022-05 – Modifications to CIP-008 Reporting Threshold SAR Drafting Team Meeting – 3:00–4:30 p.m. Eastern, April 27, 2023 | [Register](#)
- **NEW** Project 2021-04 – Modifications to PRC-002 - Phase II Standard Drafting Team Meeting – 10:00 a.m.–12:00 p.m. Eastern, April 28, 2023 | [Register](#)
- Project 2016-02 – Modifications to CIP Standards Drafting Team Meeting – 2:00–4:00 p.m. Eastern, May 1, 2023 | [Register](#)
- **NEW** Project 2022-04 – EMT Modeling SAR Drafting Team Meeting – 3:00–5:00 p.m. Eastern, May 1, 2023 | [Register](#)
- Project 2016-02 – Modifications to CIP Standards Drafting Team Meeting – 1:00–3:00 p.m. Eastern, May 5, 2023 | [Register](#)
- **NEW** Project 2016-02 – Modifications to CIP Standards Drafting Team Meeting – 12:00–2:00 p.m. Eastern, May 8, 2023 | [Register](#)
- Project 2021-07 – Extreme Cold Weather Grid Operations, Preparedness, and Coordination Standard Drafting Team Meeting – May 9–11, 2023, Louisville, KY | [Register](#)
- **NEW** Project 2016-02 – Modifications to CIP Standards Drafting Team Meeting – 12:00–2:00 p.m. Eastern, May 12, 2023 | [Register](#)

## **ERO Enterprise Events**

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

## ABOUT THE STANDARDS, COMPLIANCE, AND ENFORCEMENT BULLETIN

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

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