# Welcome to



March 20, 2023 2:00 – 3:30 p.m.

## Technical Talk with RF

March 20, 2:00 – 3:30 p.m.

Join the conversation at Slido.com #TechTalkRF





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## **Tech Talk Reminders**

Please keep your information up-to-date

• CORES, Generation Verification Forms, Entity Profile Questionnaires (quarterly)

Following an event, send EOP-004 or OE-417 forms to <a href="disturbance@rfirst.org">disturbance@rfirst.org</a> CIP-008-6 incident reports are sent to the <a href="E-ISAC">E-ISAC</a> and the <a href="DHS CISA">DHS CISA</a>

Check our monthly CMEP update and quarterly newsletter for:

- 2023 ERO Periodic Data Submittal schedule
- Timing of Standard effectiveness

BES Cyber System Categorization (CIP-002-5.1a)

Assess categorization (low, medium, or high) regularly and notify us of changes

CIP Evidence Request Tool V7.0 is online, see website



### **Certification Reminder**

This reminder is to ensure Entities registered as a Balancing Authority (BA), Reliability Coordinator (RC), and/or Transmission Operator (TOP) are aware of the Organization Certification Review and Readiness Evaluation processes. Readiness Evaluations may be required for Entities taking on responsibilities for certified Entities (e.g., Transmission Owners (TO-LCCs) in the PJM footprint).

The decision to certify and evaluate changes to an already operating and certified Registered Entity is a collaborative decision between the affected Regional Entity and NERC. Items that are to be considered in this decision include one or more of the following:

- Changes to Registered Entity's footprint (including de-certification changes to existing JRO/CFR assignments or subset list of requirements):
- Relocation of the Control Center:
- Modification of the Energy Management System (EMS) which is expected to materially affect CIP security perimeters or the System Operator's: 1) situational awareness tools, 2) functionality, or 3) machine interfaces.

If you are planning a change that falls into one of these categories, an Organizational Certification Review or Readiness Evaluation may need to be performed. Please complete the form titled "RF Certification Notification and Preliminary Questionnaire" that is located <a href="https://example.com/here.">here.</a>

In order to allow for time in scheduling, it is requested, if possible, that you **provide 12 months advance notice** of your changes to allow sufficient time for RF to review the changes and begin the process.



Reliability and Security Technical Committee (RSTC) Meeting Materials Posted

- March 21 RSTC Informational Session
- March 22 RSTC Meeting Day 1
- March 23 RSTC Meeting Day 2





New CMEP Practice Guide Posted Using the Work of Others



This is a Compliance Monitoring and Enforcement Program (CMEP) Practice Guide. It is developed exclusively by the ERO Enterprise under it so blight independence and objectivity. This CMEP Practice Guide is intended for use by ERO Enterprise Staff to support consistency as they perform CMEP activities. Thi CMEP Practice Guide is posted upublicly solely to provide transparency.

#### **ERO Enterprise CMEP Practice Guide**

Using the Work of Others March 14, 2023

#### Background

To support successful implementation and compliance with the North American Electric Reliability Corporation (NERC) Reliability Standards, the Electric Reliability Organization (ERO) Enterprise <sup>1</sup> adopted the Compliance Guidance Policy. <sup>2</sup> The Compliance Guidance Policy outlines the purpose, development, use, and maintenance of guidance for implementing Reliability Standards. According to the Compliance Guidance Policy, Compliance Guidance includes two types of guidance — (1) Implementation Guidance and (2) Compliance Monitoring and Enforcement Program (CMEP) Practice Guides. <sup>3</sup> This document summarizes some of the requirements in NERC Reliability Standards, but the language of the Reliability Standards is enforceable and supersedes any description in this document.

#### Purpose

This CMEP Practice Guide provides guidance to CMEP staff<sup>4</sup> when reviewing evidence, provided by registered entities, that is generated "Using the Work of Others." Work of Others can include an assessment of the registered entity's compliance with a Reliability Standard or an independent internal control review may be conducted by: 1) an independent Subject Matter Expert; 2) a government entity (such as the Government Accountability Office or Nuclear Regulatory Commission); 3) a contractor who has been commissioned by the registered entity as an independent third party; or 4) an internal department within the registered entity that is independent of the department performing Reliability Standards operations.

The use of the word "others" in this Practice Guide refers to internal or external parties that perform work for the registered entity. Similarly, "independent" refers to the internal or external party that can objectively carry out its work for the registered entity in an unbiased manner.

#### Using the Work of Others

A registered entity may seek to rely on the work of others to support a registered entity's demonstration of compliance with a Reliability Standard. This may include internal or external party.

<sup>&</sup>lt;sup>2</sup> Implementation Guidance provides a means for registered entities to develop examples or approaches to illustrate how registered entities



<sup>&</sup>lt;sup>2</sup> The ERO Enterprise consists of NERC and the six Regional Entities

<sup>&</sup>lt;sup>2</sup> The ERO Enterprise Compliance Guidance Policy is located on the NERC website at:

https://www.nerc.com/pa/comp/guidance/Documents/Compliance%20Guidance%20Policy.p



Level 2 <u>NERC Alert</u> Issued Inverter-Based Resource Performance Issues



#### **Industry Recommendation**

Inverter-Based Resource Performance Issues

Initial Distribution: March 14, 2023

NERC analyzed multiple large-scale disturbances on the bulk power system (BPS) involving widespread loss of inverter-based resources (IBRs). In 2021 and 2022, two disturbances in Odessa, Texas, resulted in abnormal performance across several Bulk Electric System (BES) solar photovoltaic (PV) generating resources. These resources have exhibited systemic performance issues that could lead to unexpected losses of BPS-connected generation, with the potential to cause widespread outages. As the penetration of BPS-connected IBRs continues to rapidly increase, it is paramount that any performance deficiencies with existing (and future) generation resources be addressed in an effective and efficient manner.

While this Level 2 alert is being distributed to Generator Owners (GO) of BES solar PV resources, the recommendations should also be reviewed and implemented by owners of all BPS-connected solar PV resources (See Background section for more information). The alert also seeks to gather data from solar PV asset owners to understand whether additional actions are necessary to mitigate possible BPS performance risks. Applicable GOs are strongly encouraged to consult their inverter- and plant-level controller manufacturers, review inverter settings and controls currently installed in the field, and implement the recommendations described herein, and review this information with the associated Generator Operators (GOPs) as applicable.

Note: This alert pertains specifically to solar PV resources, however, the recommendations may be applicable to BPS-connected battery energy storage systems (BESS). This alert does not pertain to wind resources as the observed performance issues are different.

For more information, see the NERC Major Event Analysis Reports <u>webpage</u>. All recipients are strongly encouraged to read the findings from these reports, particularly the 2021 Odessa Disturbance <u>report</u> and the 2022 Odessa Disturbance <u>report</u>.

Why am I receiving this? >> About NERC Alerts >>





FERC issues <u>order</u> approving Reliability Standard <u>CIP-003-9</u>

 The approved implementation plan for the Standards is 36 months

#### 182 FERC ¶ 61,155 UNITED STATES OF AMERICA FEDERAL ENERGY REGULATORY COMMISSION

Before Commissioners: Willie L. Phillips, Acting Chairman; James P. Danly, Allison Clements, and Mark C. Christie.

North American Electric Reliability Corporation Docket No. RD23-3-000

ORDER APPROVING RELIABILITY STANDARD CIP-003-9

(Issued March 16, 2023)

1. On December 6, 2022, the North American Electric Reliability Corporation (NERC), the Commission-certified Electric Reliability Organization (ERO), submitted a petition seeking approval of proposed Reliability Standard CIP-003-9 (Cyber Security – Security Management Controls). As discussed in this order, pursuant to section 215(d)(2) of the Federal Power Act (FPA), we approve proposed Reliability Standard CIP-003-9, the associated violation risk factors and violation severity levels, the proposed implementation plan, and the retirement of the currently effective Reliability Standard CIP-003-8 immediately prior to the effective date of the proposed Reliability Standard CIP-003-9 improves upon the currently effective Reliability Standard CIP-003-9 improves upon the currently effective Reliability Standard CIP-003-8 by adding new requirements focused on supply chain risk management for low impact bulk electric system (BES) Cyber Systems.<sup>5</sup>



<sup>&</sup>lt;sup>1</sup> The proposed Reliability Standard is not attached to this order. The proposed Reliability Standard is available on the Commission's eLibrary document retrieval system in Docket No. RD23-3-000 and on the NERC website, <a href="https://www.nerc.com">www.nerc.com</a>. We are concurrently issuing a notice of information collection and request for comments in this docket.

<sup>2 16</sup> U.S.C. § 824o(d)(2).

<sup>&</sup>lt;sup>3</sup> See NERC, Glossary of Terms Used in NERC Reliability Standards (Dec. 2, 2022), https://www.nerc.com/pa/Stand/Glossary%20of%20Terms/Glossary\_of\_Terms.pd f (defining BES Cyber System to mean "One or more BES Cyber Assets logically grouped by a responsible entity to perform one or more reliability tasks for a functional entity").







### GridSecCon 2023

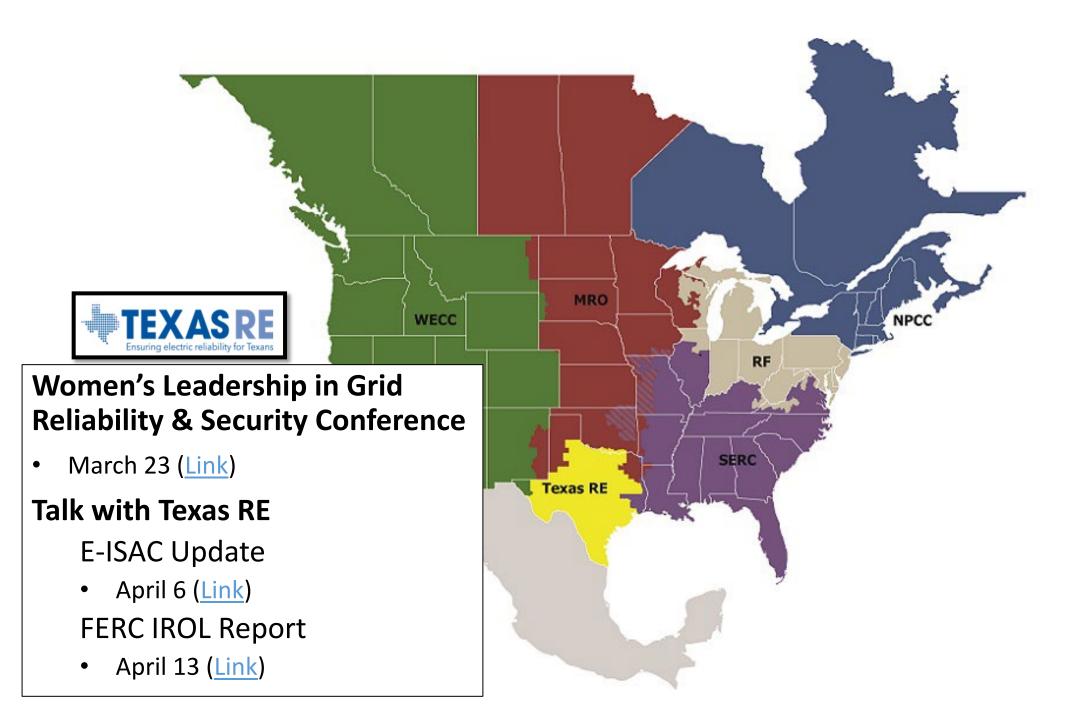
October 17-20 Save the Dates

NERC, the E-ISAC, and Northeast Power Coordinating Council (NPCC) are co-hosting the 12th annual grid security conference on October 17–20, 2023 in Québec City, Canada.

GridSecCon brings together cyber and physical security leaders from industry and government to deliver expert training sessions, share best practices and effective threat mitigation programs, and present lessons learned. Conference and hotel registration will open in May and more details will be available on the E-ISAC, NERC and NPCC websites.







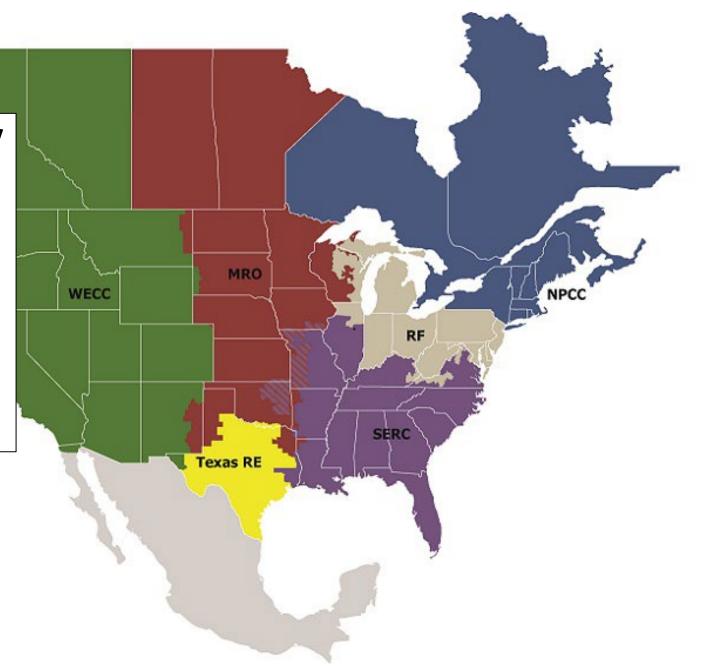


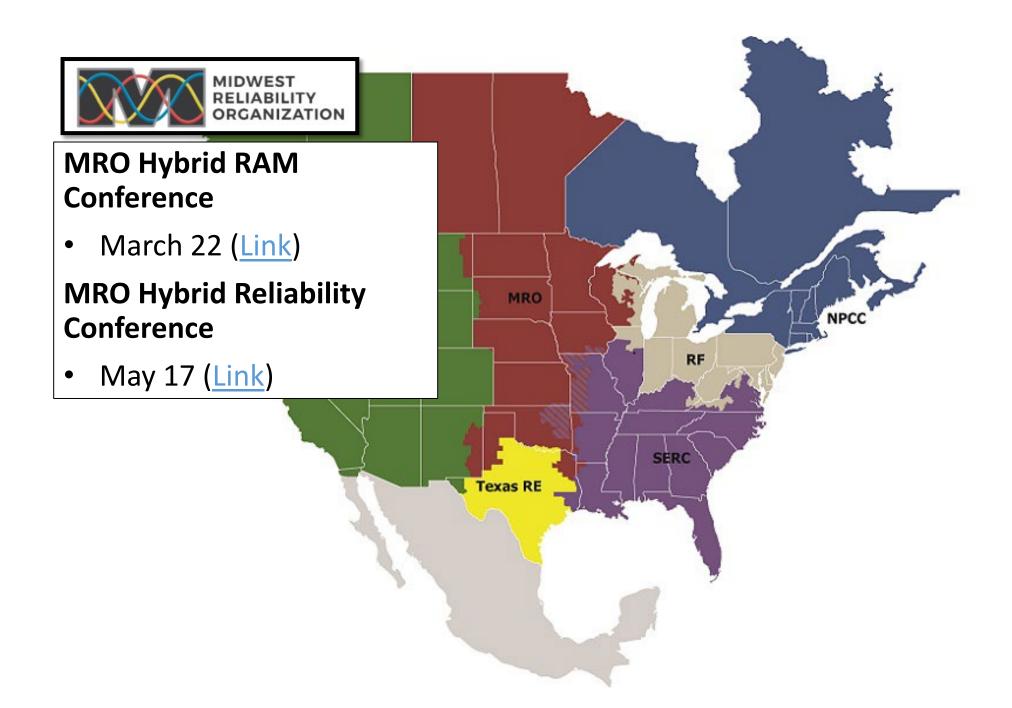
# WECC Reliability & Security Workshop - Virtual

- March 21 (<u>link</u>)
  - Align, COPs, Risk Assessments, Cold Weather, Supply Chain, Enforcement & Mitigation

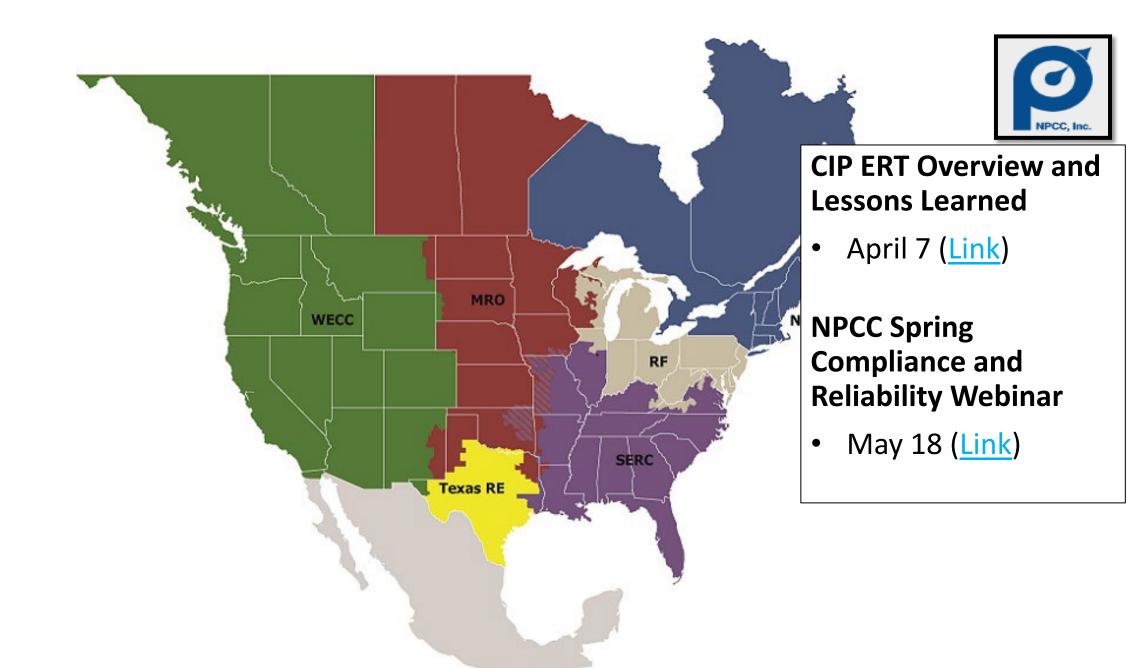
# Resource Adequacy Discussion Series

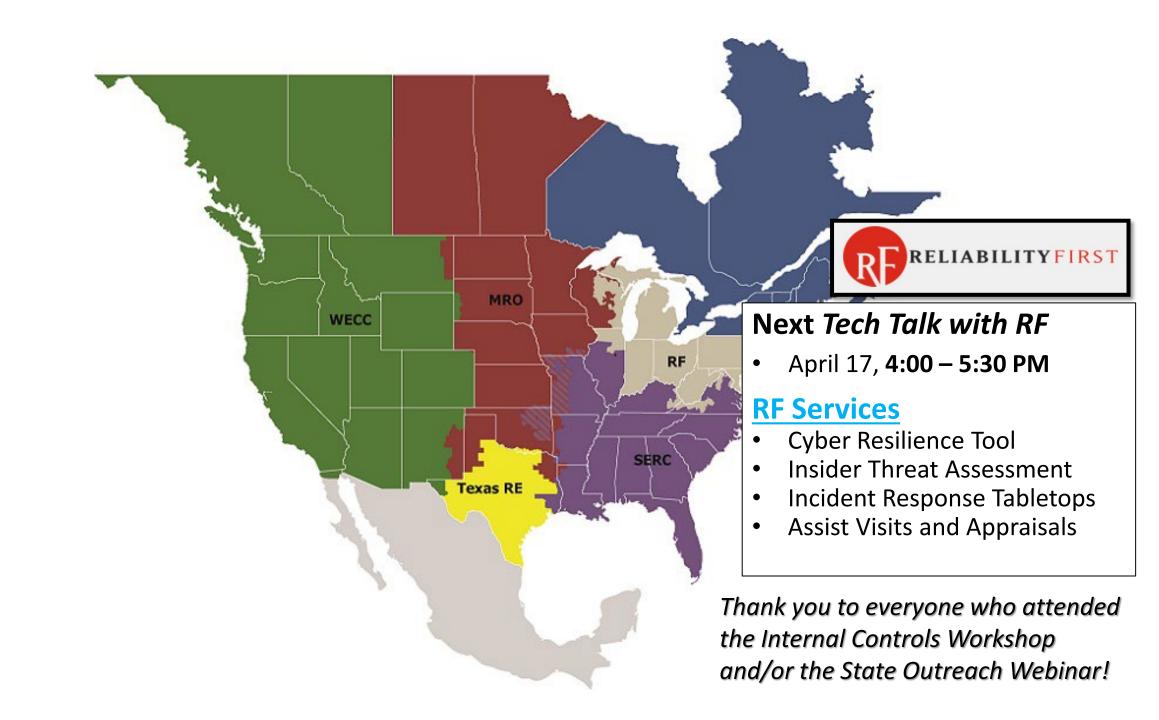
- April 6 (<u>link</u>)
  - Navigating a regional approach





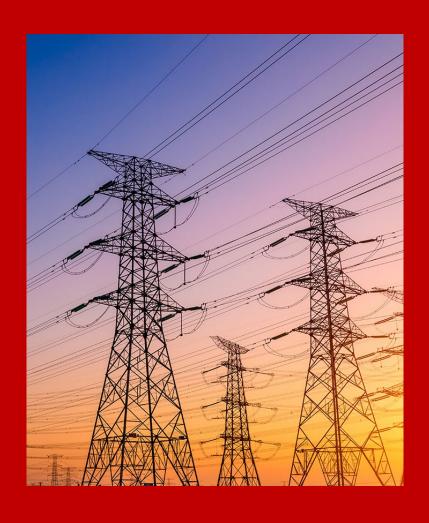






### No Registration Required

- <u>Calendar Link</u>
- Webex Link



Tech Talk for April is our regularly scheduled date (third Monday of the month) however, we are starting at 4:00 PM Eastern with a special guest presentation from our friends in Southern Australia talking about their transition to renewable energy.



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2:00 – 3:30 p.m.



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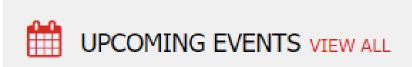
Join the conversation at Slido.com #TechTalkRF





## **Tech Talk Reminders**

Tech Talk with RF announcements are posted on our calendar on <a href="https://www.rfirst.org">www.rfirst.org</a> under Upcoming Events



March 20, 2023 Technical Talk with RF



### **Anti-Trust Statement**

It is ReliabilityFirst's policy and practice to obey the antitrust laws and to avoid all conduct that unreasonably restrains competition. This policy requires the avoidance of any conduct which violates, or which might appear to violate, the antitrust laws. Among other things, the antitrust laws forbid any agreement between or among competitors regarding prices, availability of service, product design, terms of sale, division of markets, allocation of customers or any other activity that unreasonably restrains competition.

It is the responsibility of every ReliabilityFirst participant and employee who may in any way affect ReliabilityFirst's compliance with the antitrust laws to carry out this policy.





## Tech Talk Agenda

### **Establishing and Communicating System Operating Limits**

- Dean LaForest Project 2015-09 Chair (2019-2021) and Manager of Real-Time Studies at ISO-New England
- Vic Howell Project 2015-09 Chair (2015-2019) and Director of Reliability Risk Management at WECC
- Stephen Whaite Technical Auditor, Operations & Planning Compliance Monitoring at RF

## Operational Analysis and Awareness (OAA) Update

- **Tony Purgar** Senior Manager, OAA, RF
- Kellen Phillips Principal Analyst, OAA, RF
- **Dwayne Fewless** Principal Analyst, OAA, RF

