

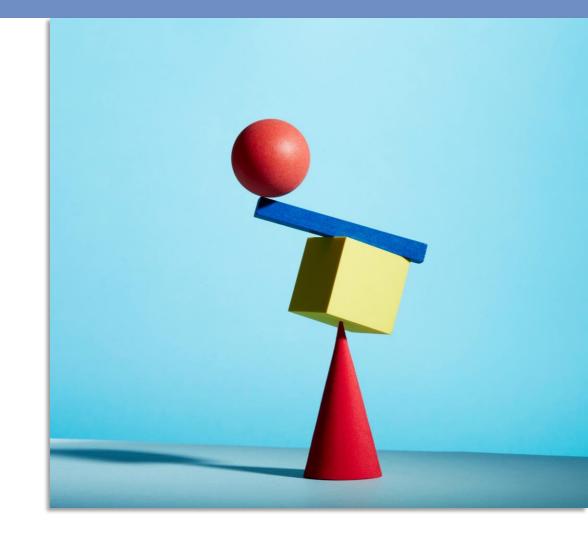
2023 ERO Implementation Plan

Rashida Caraway
Manager, Risk Assessment
Texas Reliability Entity

December 18, 2023

CMEP Implementation Plan (CMEP IP) Purpose

- ☐ Reflects ERO and Regional Entity-specific risk elements that regions prioritize for oversight of registered entities
- ☐ Developed by NERC and the Regional Entities
- ☐ Four risk priorities the CMEP IP manages
 - 1. Changing Resource Mix
 - 2. Cybersecurity Vulnerabilities
 - 3. Resource Adequacy and Performance
 - 4. Critical Infrastructure Interdependencies







Risk Elements Developed Using:

- Compliance findings
- Recent event analysis
- Data analysis
- Committees
- Publications

Risk Elements are Considered When Regions:

- Complete an Inherent Risk Assessment
- Complete a Compliance
 Oversight Plan
- Scope an engagement
 - Engagement team may use to focus on sampling and internal controls





What's New with Risk Elements?

2023	2024
Remote Connectivity	Remote Connectivity
Supply Chain	Supply Chain
N/A	Physical Security
Incident Response	Incident Response
Stability Studies	Stability Studies
Inverter-Based Resources	Inverter-Based Resources
Facility Ratings	Facility Ratings
Cold Weather Response	Extreme Weather Response





Remote Connectivity

- ☐ Focuses on the human element of security
- How do entities manage the risk of remote connectivity and the complexity of the tasks the individuals perform?

Standard	Requirement
CIP-005-7	R2, R3
CIP-007-6	R3
CIP-012-1	R1



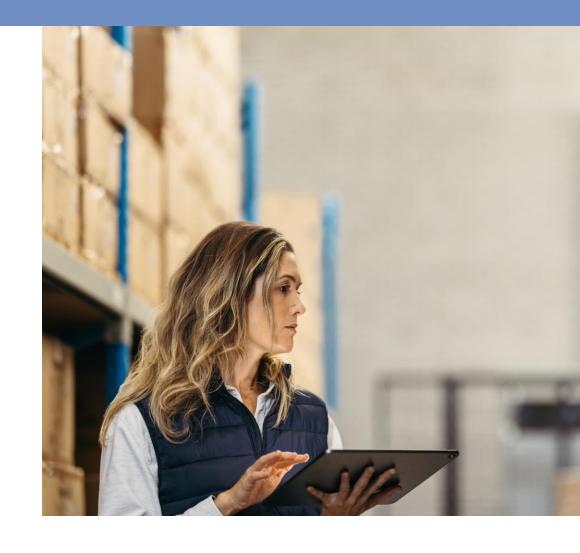




Supply Chain

- A growing risk and focal point
- ■Various publications that highlight vendors, services, and products widely used

Standard	Requirement
CIP-010-4	R1
CIP-013-2	R1, R2







Physical Security

- ☐ Incidents increasing
- Many of the attacks have been against substations or distribution infrastructure
- ■Potential use of drones for attacks

Standard	Requirement
CIP-014-3	R4, R5







Slido Question

Physical security is not related to cyber-security risks.

True or False?

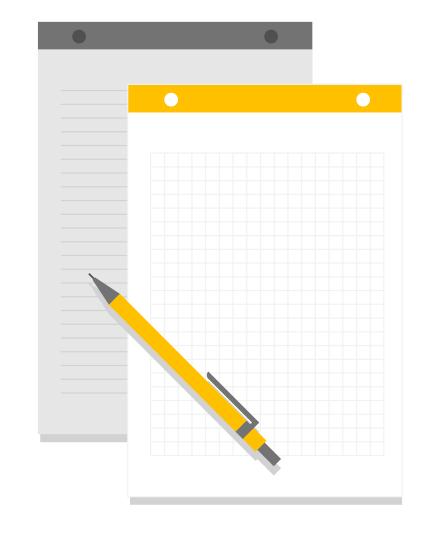




Incident Response

- ☐ Efforts underway to develop cyber tools that should assist industry in enhancing preparation and reaction plans
- ☐ Having and implementing a Cyber Security Incident response plan is important

Standard	Requirement
CIP-008-6	R1, R2, R3







Stability Studies

- □ Focuses on how the changing resource mix impacts operational and transmission planning
- Reports have highlighted insufficient model quality checks

Standard	Requirement
CIP-014-3	R1
TPL-001-4	R4, R6
TPL-001-5.1	







Inverter-Based Resources (IBR)

☐ Recent events highlighted IBR risks

- Ride-through capability during normal fault events
- Need to accurately model IBR characteristics
- Recent related NERC Alert

Standard	Requirement
FAC-001-4	R1, R2
FAC-002-4	R1, R2
MOD-026-1	R2
PRC-024-3	R1, R2







Facility Ratings

- ERO has released a guide on related best practices
- ERO is understanding more about controls entities have in place

Standard	Requirement
FAC-008-6	R6







Extreme Weather Response

- Replaces Cold Weather Response Risk Element
- Extreme heat events have had impact on BPS

Standard	Requirement
EOP-011-2	R1, R2, R3, R6, R7, R8
EOP-012-1	R1, R2, R3, R4, R5, R6, R7
TPL-007-4	R1, R2, R4, R5, R7

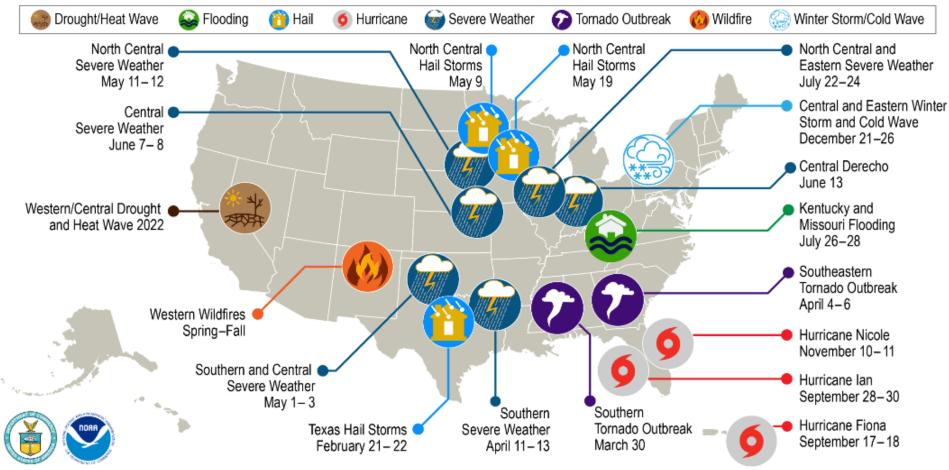






Public

Extreme Weather Response: 2022 U.S. Weather and Climate Disasters



This map denotes the approximate location for each of the 18 separate billion-dollar weather and climate disasters that impacted the United States in 2022.



Source: NOAA National Centers for Environmental Information (NCEI) U.S. Billion-Dollar Weather and Climate Disasters (2023) https://www.ncei.noaa.gov/access/billions/



Slido Question

Which Risk Element do you think poses the most risk to your registered entity(ies)?

- ☐ Remote Connectivity
- ☐ Supply Chain
- ☐ Physical Security
- ☐ Incident Response
- ☐ Stability Studies
- ☐ Inverter-Based Resources
- ☐ Facility Ratings
- ☐ Extreme Weather Response





Tying it All Together

Risk team uses current Risk Elements and engagement feedback as part of IRA and COP development process

Engagement feedback may impact monitoring interval, scope, method, or sampling

Planning – Risk
COP & Elements

Engagement &
Observation

Auditors will sample and look at internal controls during engagements

Auditors provide Risk team feedback on compliance and internal controls

n Engagement Feedback





Post

Risk

Assessment (IRA/COP)

