



COMPLIANCE BULLETIN

NOVEMBER 22, 2022

NOVEMBER 9 -10 NPCC COMPLIANCE AND RELIABILITY CONFERENCE

Thank you to all attendees for participating in the Conference. The [slides from Day 1 and Day 2](#) are posted on the NPCC website under the Conferences tab.

DECEMBER 5 INDUSTRY WEBINAR: SECURE EVIDENCE LOCKER (SEL) DATA HANDLING GUIDANCE AND ALIGN OVERSIGHT

[On December 5 at 1 PM](#), NERC will host a webinar that will provide stakeholders with guidance to improve their SEL data management practices and more efficiently manage their data. The webinar will discuss high-level recommendations from NERC's oversight of Align Release 1 activities. A question-and-answer session will follow the presentation.

KEEPING YOUR REGISTERED ENTITY CONTACT INFORMATION CURRENT

Registered entities are obligated to keep Compliance Contact information up to date in the Centralized Organization Registration ERO System (CORES). This will ensure that your entity will receive the numerous compliance and reliability messages sent by NPCC throughout the year. [CORES User and Account Establishment Guide](#) (Pages 25-26). If you need assistance, contact [NPCC Registration](#).

2023 PERIODIC DATA SUBMITTAL SCHEDULE

Certain NERC Reliability Standards have Periodic Data Submittal (PDS) obligations for certain qualifying events and/or periodic deadlines. The [2023 ERO PDS reporting schedule](#) is posted on the NPCC website. Mandatory quarterly reporting for GOs and TOs under Section C.1.4 of FAC-003 Transmission Vegetation Management is scheduled by NPCC through Align. All other reporting under the PDS reporting schedule would be made by the entity in Align upon occurrence of the event stipulated in the Reliability Standard.

WHEN TO NOTIFY NPCC OF ASSET OWNERSHIP CHANGES?

Registered entities must promptly notify [NPCC Registration](#) of the sale, purchase, or retirement of BES assets and/or any material operational changes.

- Entities may need to be added to the NERC Compliance Registry (NCR) and/or removed from the NCR.
- NPCC tracks BES assets on an entity basis and must be notified even if no registration changes are occurring.
- NPCC will also determine if an Inherent Risk Assessment (IRA) update is needed. The [IRA update template](#) is located under the Entity Risk Assessment tab of the NPCC website.



- NPCC may need to determine if a Certification Review is required of the related BA, RC, or TOP. See below for more information.

WHEN IS A CERTIFICATION REVIEW NEEDED?

[Appendix 5A - Organization Registration and Certification Manual](#) of the Rules of Procedure outlines the qualifying changes for a BA, TOP, or RC that requires NPCC and NERC to perform a Certification Review of the entity's readiness, awareness, and security. NPCC requires a one-year notice to schedule a Certification Review and can be contacted at [NPCC Certification](#). Types of changes that signal the need for a Certification Review include:

1. Changes to registered entity footprint
2. Relocation of either the Primary or Backup Control Centers
3. Modification of the Energy Management System (EMS) which is expected to materially affect either:
 - i. the CIP security perimeters or
 - ii. the System Operator's situational awareness tools, functionality, or machine interfaces

2023 ERO CMEP IMPLEMENTATION PLAN AND NPCC FOCUS AREAS

On October 28, the [2023 ERO CMEP Implementation Plan](#) was released by NERC which provides Regions and stakeholders with narratives and suggested areas of focus to consider for risk-reducing analysis and activity. The 2023 ERO plan identifies 14 O&P Requirements and 8 CIP Requirements for suggested focus.

NPCC reviewed the 2023 ERO plan and further supplemented it with an additional 64 Requirements (49 O&P, 15 CIP) that serve as NPCC Regional Focus Areas for consideration during risk-based decision making. The cumulative list of [ERO and NPCC Focus Areas for 2023](#) have been posted on the NPCC website in the Latest Documents section of the Entity Risk Assessment page.

ERO REPORT ON THEMES AND BEST PRACTICES FOR SUSTAINING ACCURATE FACILITY RATINGS

On October 20, the ERO Enterprise released the report on [Themes and Best Practices for Sustaining Accurate Facility Ratings](#). The report outlines the typical root causes of the facility ratings issues discovered:

1. Inconsistent Development and Application of Facility Ratings Methodologies
2. Lack of Awareness
3. Inadequate Asset and Data Management
4. Inadequate Change Management

The report includes examples of pitfalls and suggestions for the entity to implement. The ERO will continue to focus on identifying and mitigating Facility Ratings risks in 2023.



REMINDER: COLD WEATHER RELIABILITY STANDARDS BECOME EFFECTIVE ON APRIL 1, 2023

On April 1, 2023, the NERC Cold Weather Standards become effective.

Cold Weather Standard Version	Title and Link to Project Page	Effective Date
EOP-011-2	Emergency Preparedness and Operations	April 1, 2023
IRO-010-4	Reliability Coordinator Data Specification and Collection	April 1, 2023
TOP-003-5	Operational Reliability Data	April 1, 2023

NPPCC recommends that entities review the [ERO CMEP Practice Guide on Cold Weather](#) to prepare for the effective date. The Practice Guide provides stakeholders with an overview of what ERO CMEP Staff will be looking to acquire an understanding of during assessments of compliance and assessments of processes and controls. NPPCC also recommends that GO/GOPs be mindful of the [Implementation Plan Project 2019-06 Cold Weather](#) which is posted on the NERC website which states:

Initial Performance of Periodic Requirements

Responsible Entities shall develop, maintain, and implement the Operating Plan(s) required by Reliability Standard EOP-011-2 by the effective date of the Reliability Standard. For the cold weather preparedness plan(s) for generating unit(s) required under Requirement R7, the Responsible Entity shall perform annual inspection and maintenance of generating unit freeze protection measures under Requirement R7 Part 7.2 and conduct generating unit specific training for its maintenance and operations personnel under Requirement R8 by the effective date of the Reliability Standard.

For GO/GOPs the Implementation Plan requires:

- For R7: The GO to be able to provide documentation to show that a preparedness plan was developed prior to 4/1/23.
- For R7.2: The GO to be able to provide documentation that annual inspection and maintenance of generating unit(s) freeze protection measures took place prior to 4/1/23.
- For R8: The GO/GOP to be able to provide documentation that training for maintenance and operations personnel was completed prior to 4/1/23.

ADDITIONAL RELIABILITY STANDARDS BECOMING EFFECTIVE IN 2023

Standard Version	Title and Link to Project Page	Effective Date
TPL-007-4 (R3, R4, R8, and sub requirements)	Transmission System Planned Performance for Geomagnetic Disturbance	January 1, 2023
TPL-001-5.1	Transmission System Planning Performance Requirements	July 1, 2023



ADDITIONAL CMEP INFORMATION

For additional CMEP information, see the October 2022 edition of [NERC News](#).