

**RELIABILITY FIRST**

February 1, 2022

To: ReliabilityFirst Compliance Contacts
Subject: RF Compliance Program Update Letter – February 2022



Align Update – 2/1/2022

Please read the [January 2022 Align Registered Entity Newsletter](#) attached to this email. It includes valuable updates and new information on the ERO Secure Evidence Locker (SEL), Releases 3 (R3) and 4 launch status updates, performance impacts to Align and Preliminary Findings and Interim Solutions, and much more!

2022 PRC-023-4-Annual Periodic Data Submittal Coming due in Align

The 2022 PRC-023-4-Annual Periodic Data Submittal (PDS) will be posted in Align on March 1, 2022.

IMPORTANT: This PDS requires that Qualifying Questions be answered and data to be uploaded to the SEL (if applicable) to complete the submission. If the Standard and Requirements are applicable, you will be required to complete and upload the Data Submittal Form – PRC-023-4 to the SEL before taking the “action” to submit the PDS.

Please keep the following instructions in mind when submitting your responses for this PDS:

- It is advised that only one person complete the Qualifying Questions and submit the response to prevent any potential conflict issues between responses. Only a user whose name is listed in Align under Qualifying Questions can submit responses.
- Once a PDS has been posted in Align, it will open Qualifying Questions only to PCC and ACC with Align Submitter roles. If a Registered Entity changes their PCC or ACC midstream, after the PDS is posted, the new contact will not be able to submit the Qualifying Questions required to submit the PDS. Please make sure that any person or contact who is responsible for submitting the PDS has been granted the proper credentials and permissions, as these cannot be easily corrected.
- For this specific PDS, remember that, if PRC-023-4 is not applicable to your Entity, you can complete a Request for Attestation in Align. This is done in the PDS interface and must be

done before you submit the PDS. The Attestation must include a detailed description explaining why PRC-023-4 is NA to you. Simple responses such as “not applicable” or “we don’t have any relays” are not acceptable and your Request for Attestation will be disapproved. If your Request for Attestation is not approved, the Attestation cannot be redone until you submit the next scheduled PRC-023 PDS next year.

- Please do not make multiple attestations for PRC-023.
- Any changes to the PCC and ACC must be made in both CORES and CDMS. If changes were not updated properly in the ERO Portal/CORES, then the changes will not be integrated to Align and the contact will not appear in Align. Please make sure that any changes are done well in advance of the PDS posting. **Remember, it takes 48 hours for Align permissions to become effective from the date access is approved by PCC or Entity Admin.**

Resources

In addition to the [RF Align page](#), the [NERC Align Project page](#) and [FAQ](#) document also contain helpful information. Self-service training resources provided for Registered Entity staff, including training videos and user guides, are available on the [NERC Training Site](#).

As always, stakeholders are welcome to send comments or questions to AskAlign@nerc.net



Registered Entities must continue to **make any necessary changes or updates to Compliance Contacts in CORES and also in the RF webCDMS system.** This will help ensure the data remains consistent in both systems. This process will remain in effect until further notice, or until the legacy Regional systems are fully decommissioned on a date yet to be determined.

Compliance Guidance – NERC Practice Guides

NERC compiles Implementation Guidance and CMEP Practice Guides for specific Standards and Requirements, which can be found [here \(ERO Enterprise - Endorsed Implementation Guidance\)](#). CMEP Practice Guides address how ERO Enterprise CMEP staff execute compliance monitoring and enforcement activities. They are developed and maintained by the ERO Enterprise, although in some cases, may be developed following policy discussions with industry stakeholders. CMEP Practice Guides are posted on the NERC website for transparency.

NEW! NERC has posted two new CMEP Practice Guides to their Compliance Guidance webpage. The [CIP-014-2 R1 Practice Guide](#) addresses the CIP-014-2 R1 risk assessment. The [TPL-001-4 and TPL-001-5.1 Table 1 Contingencies Practice Guide](#) provides guidance to CMEP staff around understanding Entity practices and controls for creating the Contingency lists identified in Table 1 of TPL-001-4 and TPL-001-5.1.

As the generation landscape continues to evolve in the Midwest, planning studies become even more critical while we collaborate to determine not just resource adequacy in our Region, but risks regarding inertia, congestion, deliverability, congestion, and new system vulnerabilities. These new practice guides focus on ERO expectations for these studies and how they can help identify critical substations, as well as mitigate future risks through engineering analysis. **For those responsible for these studies, please share these documents with your planning subject matter experts.** For those responsible for developing and submitting data used to perform planning studies, please review the library of [RSTC reliability guidelines](#) related to planning, modeling, and submitting this data, plus the [NATF reference](#).



Monthly Technical Talk with RF Call

The next Tech Talk with RF will be held on **Monday, February 14** from 2-3:30 p.m. EST.

Note Date Change: February's call was moved up one week due to Presidents' Day.

Tentative Agenda Topics

Align Update

Anthony Jablonski – Manager, Risk Analysis and Mitigation (RAM), RF

- This update is especially relevant for Primary Compliance Contacts (PCC) and their alternates who are responsible for using Align and the Secure Evidence Lockers.

Physical Security - Lessons Learned and Best Practices

Kevin Doss, CPP, PSP – Chief Executive Officer, Level 4 Security

- Kevin will share his field experiences in protecting critical components of substations and power plants, as well as how to include these protections in CIP-014 physical security plans.

- This presentation is especially relevant for anyone involved with physical security, plus compliance personnel associated with CIP Standards.

Physical Security – Visitor Access

Tony Freeman – Principal Analyst, RAM, RF

- As we navigate the details of the “new normal” hybrid work environment with staff both in-person and virtual, it is timely to review the risk of visitor access. Tony will present CIP-006-6, including a discussion on the controls that can be implemented to help mitigate this risk and lessons learned from past self-reports.
- This presentation is especially relevant for anyone involved with physical security and compliance personnel associated with CIP Standards.

For all Technical Talk with RF calls: [WebEx dial-in details](#) will be posted on a monthly basis to the RF website. Please contact [Brian Thiry](#), Director, Entity Engagement, with any questions, suggestions or topics of interest for future calls. For dial-in information and more details, please read the announcement attached to this email.

Violations Reporting

As a reminder, any new violation of a Reliability Standard identified by a Registered Entity should be immediately self-reported to RF via the new Align system. Contact [Shirley Ortiz](#), Senior Paralegal, at (216) 503-0674 with any questions concerning self-reports.

Align Support – ERO Help Desk Ticketing System

If users encounter any access or system problems with Align, CORES, or any of the other NERC applications, first and foremost, try to resolve the issues yourself by using any one of the many self-service resources, guides and videos NERC has made available to you at <https://training.nerc.net/>.

If you are unable to resolve the issue on your own, place a ticket using the NERC Helpdesk Ticket Submission System: <https://support.nerc.net>.

The ERO Help Desk Ticketing System (Footprints) is available to Registered Entity users 24/7 and is monitored by the Regions and NERC. We will do our best to address your questions, concerns or issues as promptly as possible during normal business hours.

WebCDMS Support

Any issues or questions related to the webCDMS system should be directed to the OATI Help Desk. The Help Desk is available during normal business hours (7 a.m. to 7 p.m. CST) for non-emergencies and 24/7/365 for critical system emergencies. Contact the OATI [Help Desk](#) by email or at (763) 201-2020. (Any questions pertaining to compliance with the NERC Reliability Standards should be directed to RF, not the Help Desk.)

2022 Upcoming Standards Subject to Future Enforcement		
CIP-012-1	Cyber Security – Communications between Control Centers	July 1, 2022
PRC-002-2	Disturbance Monitoring and Reporting Requirements (100% compliance for Requirements R2–R4, R6–R11)	July 1, 2022
CIP-005-7	Cyber Security — Electronic Security Perimeter(s)	October 1, 2022
CIP-010-4	Cyber Security — Configuration Change Management and Vulnerability Assessments	October 1, 2022
CIP-013-2	Cyber Security - Supply Chain Risk Management	October 1, 2022
PRC-024-3	Frequency and Voltage Protection Settings for Generating Resources	October 1, 2022

2023 Upcoming Standards Subject to Future Enforcement		
TPL-007-4	Transmission System Planned Performance for Geomagnetic Disturbance (R3, R4,4.1, 4.1.1-4.1.2, 4.2, 4.3, 4.3.1, R8, 8.1, 8.1.1-8.1.2, 8.3, 8.3.1)	January 1, 2023
EOP-011-2	Emergency Preparedness and Operations	April 1, 2023
IRO-010-4	Reliability Coordinator Specification and Collection	April 1, 2023
TOP-003-5	Operational Reliability Data	April 1, 2023
TPL-001-5.1	Transmission System Planning Performance Requirements	July 1, 2023

Please refer to the [U.S. Effective Dates](#) page on the NERC website for additional detail.

Data Submittals Due in February 2022 - None
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Data Submittals Due in March 2022			
Date Due	Standard	Applicable Functions	Description
03/31/2022	PRC-023-4	TO, GO, DP, PA/PC	PRC-023-4 - Transmission Relay Loadability – Data Submittal (Submissions to be made in Align)

NERC

NORTH AMERICAN ELECTRIC
RELIABILITY CORPORATION

ALIGN

Registered Entity Newsletter

January 2022

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LET'S GET ALIGNED: KEY TAKEAWAYS

Release 3 Update

Align Release 3 was deployed to production on December 9, 2021. This deployment included three parts: a platform upgrade, deployment of audit and scheduling functionality, and migration of closed violations from regional legacy systems.

Shortly after deployment, the system experienced database performance issues. The project team took the system offline on Tuesday, December 14, in order to perform root cause analysis. The system was offline until Monday, December 20, 8 am EST.

Outlined below are the project team's initial findings and activities in progress to resolve the issues. A formal report will be published in February 2022.

Preliminary Findings and Interim Solutions

Performance impacts to Align were uncovered after loading the historical closed violations from regional legacy systems. Simultaneously, the use of periodic data submittals (PDS) and self certifications (SC) functionality increased exponentially due to year-end activities in the regions. It was determined that the current technical design of PDSs and SC are inefficient and consume too much database processing power, in turn impacting performance of the reporting engine. This was not found during the testing phase. These inefficiencies became more impactful because historical data was also loaded into the database. We do not believe deployment of Release 3 functionality was the root cause.

The PDS and SC functionality will be redesigned to be more efficient. As an interim step, the regions are processing PDSs in batches not to exceed 50, and submitting SCs one at a time. The redesign will remove this restriction. The same design principles are used in the Release 3 audit functionality. Those same performance improvements will be made in this area.

These interim solutions do not impact the registered entities' ability to submit a self-report, PDS or SC.

Additionally, an issue was identified in the reporting database. The resolution will include adding a separate database to the reporting engine to off-load performance away from the application.

Long-Term Solutions and Future Mitigations

To mitigate future Align performance issues, the project team, in partnership with the key vendor, is undertaking the following actions:

- Prioritize the performance and stability of the platform during January and February 2022.
 - Redesign PDSs and SCs; apply those same updates to Release 3 audit functionality; minimal re-training expected
- Re-design and re-factor database queries and reporting capability
- Create an additional reporting instance away from the application to off-load processing
- Our vendor will review Release 3 audit design to ensure optimal performance, and do a deep review of future technical designs
- Engage a third party for additional performance testing

The project team will advise in March regarding an updated schedule for Release 4 and Canadian jurisdiction implementation. Regional adoption plans for Release 3 are under review pending the resolution of performance issues.

Release 4

The Align project team commenced development of Release 4 on November 1. The team made progress on two development cycles prior to the deployment of Release 3 and the unplanned outage. The schedule for Release 4 will be reset after Release 3 performance issues are resolved.

ERO SEL Update

The Align project team and support resources are aware of and aggressively addressing intermittent access and permission issues regarding the ERO Enterprise Secure Evidence Locker (ERO SEL). NERC has supplemented its team with additional support resources from the key vendor to resolve these issues. NERC will provide an update to the regional change agents as resolutions are identified and implemented. NERC appreciates the patience of both regional staff and stakeholders as we work through these technical challenges while maintaining data security.

Canadian Jurisdictions' Use of Align

The Align project team continues to work with those Regions that support Canadian regulators (i.e., MRO, NPCC, and WECC) to create project plans and activities in support of using Align. These activities include determining high-level requirements by province, importing provincial standards data into Align, and defining the appropriate user roles.

Currently, Ontario is live with Align as of Release 1 in May 2021. The implementation plan for Canadian provinces is below, but is subject to change as requirements and data elements are finalized, and also the resolution of Release 3 performance issues:

- Manitoba & Saskatchewan (MRO) – Q2 2022
- Alberta & British Columbia (WECC) – Q3 2022
- Nova Scotia (NPCC) – Q4 2022

Accessing Align

An important part of the project's success is ensuring appropriate access to the system. An active ERO Portal Account is required to access Align and the ERO SEL. **Please follow the instructions below to verify an existing account or set up a new account and note that it takes 48 hours for a new account to be activated.** For password resets, select the "Forgot Password/Username" to reset a password. For questions or problems concerning ERO Portal accounts, please submit a support ticket [here](#).

All registered entities' primary compliance contacts (PCCs) should also have an ERO Portal Account and be set up as Align Registered Entity Submitters and the Entity Administrators responsible for approving access requests. Users approved by the PCCs are automatically given an ERO SEL submitter role. Additional access to the ERO SEL outside of Align access must be handled with a support ticket.

Refer to the [Registered Entity User Access Guide](#) for detailed instructions.

To Set Up an ERO Portal Account:

1. Navigate to <https://eroportal.nerc.net>.
2. Select "Register" in the upper left-hand corner.
3. Complete the registration form and click "Submit."

To Verify an ERO Portal Account:

1. Navigate to <https://eroportal.nerc.net>.
2. Select "Sign In" in the upper left-hand corner.
3. Enter your credentials to confirm access to ERO Portal.

Quick Links for Reference

Here is a list of links to commonly requested project materials for Align and the ERO SEL. Please reach out to your Change Agents for additional materials.

Quick Links
FAQs
Align Governance Model (Updated April 2021)
Registered Entity SEL Requirements (Updated February 2021)

NERC Training Site
Release 1 CEA User Guide
CEA SEL User Guide
Release 2 CEA User Guide
Registered Entity User Access Guide
Data Handling Guide to Align and ERO SEL
Align Business Case

Want to Learn More? Key Contacts and Resources

Please submit questions to AskAlign@NERC.net or reach out to your Regional Change Agent. The change agents meet monthly and have the latest project updates. They are another resource for asking questions or sharing comments and feedback on the project.

Align Change Agents	
Organization	Change Agents
MRO	Desiree Sawyer , Marissa Falco
NERC	Chris Boyd-Witherspoon , Jamie Calderon , Farzaneh Tafreshi , Sara Minges
NPCC	Jason Wang , Kimberly Griffith
ReliabilityFirst	Anthony Jablonski
SERC	Andrew Williamson , Janice Carney , Melinda Montgomery , Rick Dodd , Todd Curl
Texas RE	Rochelle Brown
WECC	Angie Shapiro , Ben Aldous , Mailee Cook

Release 2 Training Contacts	
Region	Training Leads
MRO	Desiree Sawyer ; Jeremy Mattke ; Rob Quinlan
NPCC	Daniel Kidney ; Duong Le ; Kimberly Griffith
ReliabilityFirst	Bob Folt ; Bob Yates ; George Spila ; Anthony Jablonski ; Ron Ross
SERC	Alex Shestopal ; Derek Lepresti ; Janice Carney ; Rafael Lerdo ; Rick Dodd ; Shawna Speer

Release 2 Training Contacts

Texas RE	Ben Gregson ; Dennis Glass ; Devin Kitchens ; Eric Newnam ; Rochelle Brown
WECC	Aldo Nevarez ; Angie Shapiro ; Duane Cooke ; Jessica King ; Tyler Whiting

ABOUT THE ALIGN NEWSLETTER

This newsletter compiles a list of important Align project updates with actionable deadlines, as well as upcoming events, recently posted resources, and other relevant news and information. Please email AskAlign@nerc.net with feedback on this newsletter. Current and future newsletters and additional project resources, including the regularly updated [Align FAQs](#), can be found on the [Align Project Site](#).

ERO Enterprise Periodic Data Submittals Schedule

2022 Consolidated ERO Enterprise Periodic Data Submittals Schedule

Background

The Compliance Enforcement Authority (CEA) requires Periodic Data Submittals (PDS) in accordance with the schedule stated in the applicable Reliability Standards, as established by the CEA, or as-needed, in accordance with the NERC Rules of Procedure (RoP), Appendix 4C Section 3.6. The purpose of this schedule is to provide registered entities a consistent list of required Reliability Standard Periodic Data Submittals throughout the Electric Reliability Organization (ERO) Enterprise. For the current transition of moving PDS reporting from legacy tools into Align, some of the below reporting dates may be impacted as tool functionality is developed. The Regional Entities will work with each entity, as the need arises, to extend any reporting deadlines while facilitating reporting as close to the below dates as possible.” NERC and the Regional Entities (REs) may also request data or information under Sections 800 or 1600 of the NERC RoP; these data requests are not included on this schedule.

The registered entities must provide the required information to the CEA in the format and by the required date specified in the request. The CEA reviews the data submittal to determine compliance with the Reliability Standards and may request additional data and/or information if necessary. If the CEA’s review of the data submittal indicates a potential noncompliance with a Reliability Standard requirement by the registered entity, the CEA performs a Preliminary Screen of the potential noncompliance in accordance with NERC RoP, Appendix 4C Section 3.8. As of 2021, all registered entities who use the Align tool for submitting data to their CEA will use the Align tool for the submission of Periodic Data Submittals; except as noted in the table. For additional information, please discuss with your CEA compliance contact.

ERO Enterprise Data Submittal Schedule

ERO-Wide Data Submittal Schedule

Reliability Standard	Requirement(s)	Submit To	Submittal Frequency	Proposed Due Dates
BAL-003-2 ¹	R1	NERC	Annually	Per dates as detailed in BAL-003-2 Reliability Standard Attachment A's Timeline for Balancing Authority Frequency Response and Frequency Bias Setting Activities.
EOP-004-4 ²	R2	NERC	Per Standard	Event Driven
EOP-008-2	R8	RE	Per Standard	Within six calendar months of the date when the functionality is lost

¹ Data is reported through the NERC Balancing Authority Submittal Site (BASS) rather than through Align. This site is maintained by the NERC Resource Subcommittee

² Data is reported to the NERC System Awareness team (per attachment 1 of EOP-004-4) as well as through Align

ERO Enterprise Data Submittal Schedule

FAC-003-4	C.1.4	RE	Quarterly	20 days after the end of the quarter
PRC-002-2	R12	RE	Per Standard	Within 90 calendar days of the discovery of a failure of the recording capability for the SER, FR or DDR data
PRC-023-4	R5	RE	Annually	At least once each calendar year, with no more than 15 months between reports. This applies only if the entity chooses to set relays on circuits according to Criterion 12 of R1.
PRC-023-4	R6.2	RE	Per Standard	Within 30 calendar days of the establishment of the initial list and within 30 days of any changes to list
TPL-001-4	Multiple See Footnote 12	RE	Per Standard	After the PC or TP receives assurance from their applicable regulatory authorities or governing bodies responsible for electric service issues do not object to the use of Non-Consequential Load Loss under footnote 12. See Appendix A for additional details on the ERO process for the determination as described in Attachment 1 of TPL-001-4.
TPL-007-4	R7.4	RE	Per Standard	Within a timely manner following the identification of the responsible entity being unable to implement the CA within the timetable submitted for Part 7.3 and prior to the end date of the submitted timetable.
TPL-007-4	R11.4	RE	Per Standard	Within 1 year of completion of the supplemental GMD Vulnerability Assessment and in a timely manner after determining that the implementation of the CAP by the responsible entity will require an extension of the timetable submitted per R11.3.

RE-Specific Data Submittal Schedule

Reliability Standard	Requirement(s)	Submit To	Submittal Frequency	Proposed Due Dates
BAL-001-TRE-2	R1	Texas RE	Per Standard	Within 14 calendar days after each Frequency Measurable Event.
BAL-001-TRE-2	R2.2	Texas RE	Per Standard	By the end of the month in which the Primary Frequency Response calculation results were completed.

Appendix A: Full Requirement Text or Subpart

Reliability Standard	Requirement(s)	Full Text of Requirement or subpart
BAL-003-2	R1	Each Frequency Response Sharing Group (FRSG) or Balancing Authority that is not a member of a FRSG shall achieve an annual Frequency Response Measure (FRM) (as calculated and reported in accordance with Attachment A) that is equal to or more negative than its Frequency Response Obligation (FRO) to ensure that sufficient Frequency Response is provided by each FRSG or BA that is not a member of a FRSG to maintain Interconnection Frequency Response equal to or more negative than the Interconnection Frequency Response Obligation.
EOP-004-4	R2	Each Responsible Entity shall report events specified in EOP-004-4 Attachment 1 to the entities specified per their event reporting Operating Plan by the later of 24 hours of recognition of meeting an event type threshold for reporting or by the end of the Responsible Entity's next business day (4 p.m. local time will be considered the end of the business day).
EOP-008-2	R8	Each Reliability Coordinator, Balancing Authority, and Transmission Operator that has experienced a loss of its primary or backup functionality and that anticipates that the loss of primary or backup functionality will last for more than six calendar months shall provide a plan to its Regional Entity within six calendar months of the date when the functionality is lost, showing how it will re-establish primary or backup functionality.
FAC-003-4	C.1.4	<p>The applicable Transmission Owner and applicable Generator Owner will submit a quarterly report to its Regional Entity, or the Regional Entity's designee, identifying all Sustained Outages of applicable lines operated within their Rating and all Rated Electrical Operating Conditions as determined by the applicable Transmission Owner or applicable Generator Owner to have been caused by vegetation, except as excluded in footnote 2, and including as a minimum the following:</p> <ul style="list-style-type: none"> The name of the circuit(s), the date, time and duration of the outage; the voltage of the circuit; a description of the cause of the outage; the category associated with the Sustained Outage; other pertinent comments; and any countermeasures taken by the applicable Transmission Owner or applicable Generator Owner. <p>A Sustained Outage is to be categorized as one of the following:</p> <ul style="list-style-type: none"> Category 1A — Grow-ins: Sustained Outages caused by vegetation growing into applicable lines, that are identified as an element of an IROL or Major WECC Transfer Path, by vegetation inside and/or outside of the ROW; Category 1B — Grow-ins: Sustained Outages caused by vegetation growing into applicable lines, but are not identified as an element

		<p>of an IROL or Major WECC Transfer Path, by vegetation inside and/or outside of the ROW;</p> <ul style="list-style-type: none"> • Category 2A — Fall-ins: Sustained Outages caused by vegetation falling into applicable lines that are identified as an element of an IROL or Major WECC Transfer Path, from within the ROW; • Category 2B — Fall-ins: Sustained Outages caused by vegetation falling into applicable lines, but are not identified as an element of an IROL or Major WECC Transfer Path, from within the ROW; • Category 3 — Fall-ins: Sustained Outages caused by vegetation falling into applicable lines from outside the ROW; • Category 4A — Blowing together: Sustained Outages caused by vegetation and applicable lines that are identified as an element of an IROL or Major WECC Transfer Path, blowing together from within the ROW; • Category 4B — Blowing together: Sustained Outages caused by vegetation and applicable lines, but are not identified as an element of an IROL or Major WECC Transfer Path, blowing together from within the ROW. <p>The Regional Entity will report the outage information provided by applicable Transmission Owners and applicable Generator Owners, as per the above, quarterly to NERC, as well as any actions taken by the Regional Entity as a result of any of the reported Sustained Outages.</p>
PRC-002-2	R12	<p>Each Transmission Owner and Generator Owner shall, within 90-calendar days of the discovery of a failure of the recording capability for the SER, FR or DDR data, either:</p> <ul style="list-style-type: none"> • Restore the recording capability, or • Submit a Corrective Action Plan (CAP) to the Regional Entity and implement it.
PRC-023-4	R5	<p>Each Transmission Owner, Generator Owner, and Distribution Provider that sets transmission line relays according to Requirement R1 criterion 12 shall provide an updated list of the circuits associated with those relays to its Regional Entity at least once each calendar year, with no more than 15 months between reports, to allow the ERO to compile a list of all circuits that have protective relay settings that limit circuit capability.</p>
PRC-023-4	R6.2	<p>Provide the list of circuits to all Regional Entities, Reliability Coordinators, Transmission Owners, Generator Owners, and Distribution Providers within its Planning Coordinator area within 30 calendar days of the establishment of the initial list and within 30 calendar days of any changes to that list.</p>
TPL-001-4	Multiple See Footnote 12	<p>An objective of the planning process is to minimize the likelihood and magnitude of Non-Consequential Load Loss following planning events. In limited circumstances, Non-Consequential Load Loss may be needed throughout the planning horizon to ensure that BES performance</p>

		requirements are met. However, when Non-Consequential Load Loss is utilized under footnote 12 within the Near-Term Transmission Planning Horizon to address BES performance requirements, such interruption is limited to circumstances where the Non-Consequential Load Loss meets the conditions shown in Attachment 1. In no case can the planned Non-Consequential Load Loss under footnote 12 exceed 75 MW for US registered entities. The amount of planned Non-Consequential Load Loss for a non-US Registered Entity should be implemented in a manner that is consistent with, or under the direction of, the applicable governmental authority or its agency in the non-US jurisdiction.
TPL-007-4	R7.4	<p>The CAP shall:</p> <p>R7.4 Be submitted to the Compliance Enforcement Authority (CEA) with a request for extension of time if the responsible entity is unable to implement the CAP within the timetable provided in Part 7.3. The submitted CAP shall document the following:</p> <ul style="list-style-type: none"> • 7.4.1. Circumstances causing the delay for fully or partially implementing the selected actions in Part 7.1 and how those circumstances are beyond the control of the responsible entity; • 7.4.2. Revisions to the selected actions in Part 7.1, if any, including utilization of Operating Procedures, if applicable; and • 7.4.3. Updated timetable for implementing the selected actions in Part 7.1.
TPL-007-4	R11.4	<p>The CAP shall:</p> <p>R11.4 Be submitted to the CEA with a request for extension of time if the responsible entity is unable to implement the CAP within the timetable provided in Part 11.3. The submitted CAP shall document the following:</p> <ul style="list-style-type: none"> • 11.4.1. Circumstances causing the delay for fully or partially implementing the selected actions in Part 11.1 and how those circumstances are beyond the control of the responsible entity; • 11.4.2. Revisions to the selected actions in Part 11.1, if any, including utilization of Operating Procedures, if applicable; and • 11.4.3. Updated timetable for implementing the selected actions in Part 11.1.
Reliability Standard	Requirement(s)	Full Text of Requirement or subpart
BAL-001-TRE-2	R1	The Balancing Authority shall identify Frequency Measurable Events (FMEs), and within 14 calendar days after each FME the Balancing Authority shall notify the Compliance Enforcement Authority and make FME information (time of FME (t(0)), pre-perturbation average frequency, post-perturbation average frequency) publicly available.
BAL-001-TRE-2	R2.2	The calculation results shall be submitted to the Compliance Enforcement Authority and made available to the Generator Owner by the end of the month in which they were completed.

Appendix B: TPL-001-4 Use of Footnote 12 for Non-Consequential Load Loss Review Process

Background

This Electric Reliability Organization (ERO) Enterprise³ TPL-001-4: Use of Footnote 12 for Non-Consequential Load Loss Review Process document addresses how ERO Enterprise staff will jointly review requests to utilize footnote 12 for Non-Consequential Load Loss under TPL-001-4 to determine whether it would cause any Adverse Reliability Impact in a timely, structured, and consistent manner.

NERC Compliance Assurance will maintain this document under existing ERO Enterprise processes. This document will be reviewed and updated by NERC Compliance Assurance, as needed.

Definitions

For purposes of this process, the following capitalized terms will have the definitions set forth in the NERC Glossary of Terms. For ease of reference, the definitions of the following terms that are used in this process are also included below.

Adverse Reliability Impact – The impact of an event that results in frequency-related instability; unplanned tripping of load or generation; or uncontrolled separation or cascading outages that affects a widespread area of the Interconnection.

Consequential Load Loss – All Load that is no longer served by the Transmission system as a result of Transmission Facilities being removed from service by a Protection System operation designed to isolate the fault.

Non-Consequential Load Loss – Non-Interruptible Load loss that does not include: (1) Consequential Load Loss, (2) the response of voltage sensitive Load, or (3) Load that is disconnected from the System by end user equipment.

These additional capitalized terms are also used in this process and have the definitions set forth below.

Affected Regional Entity (ARE) – A Regional Entity, other than the Lead Regional Entity, in which the Multi-Region Registered Entity participating in coordinated oversight is registered for various NERC functional responsibilities.

Compliance Enforcement Authority (CEA) – NERC or the Regional Entity in their respective roles of monitoring and enforcing compliance with the NERC Reliability Standards.

³ The ERO Enterprise is comprised of NERC and the Regional Entities.

Coordinated Oversight – The agreed upon steps and activities that a Lead Regional Entity and Affected Regional Entity(ies) follow for coordinating activities associated with delegated functions (e.g., compliance and enforcement, system events, etc.) for Multi-Region Registered Entities that have been approved for participation in the Program.

Lead Regional Entity (LRE) – The Regional Entity selected by the Electric Reliability Organization (ERO) Enterprise to lead coordinated efforts related to oversight of a Multi-Region Registered Entity participating in the Program. When appropriate, the ERO Enterprise may designate more than one LRE. The designated LRE could be changed, as agreed upon by the ERO Enterprise. In the event of a change, the registered entity will be notified 60 days prior to the effective date of the change.

Multi-Region Registered Entity (MRRE) – For the purposes of this guide, a registered entity—or two or more registered entities that are corporate affiliates—performing bulk electric system (BES) functions in two or more Regional Entities that has been approved for coordinated functions and responsibilities by the ERO Enterprise. It is acknowledged there are other registered entities that are corporate affiliates and performing BES functions in two or more Regional Entities that are not included in the Program.

Process Overview

If a Planning Coordinator (PC) or Transmission Planner (TP) (entity) has determined that the use of Non-Consequential Load Loss under Table 1, footnote 12 is needed as an element of a Corrective Action Plan in Year One of the Planning Assessment, then the entity must ensure that the applicable regulatory authorities or governing bodies responsible for retail electric service issues do not object to the use of Non-Consequential Load Loss under footnote 12, and then submit a request the ERO for a determination of whether there are any Adverse Reliability Impacts caused by the request to utilize footnote 12 for Non-Consequential Load Loss, if certain conditions are met as outlined in Attachment 1 of TPL-001-4.

Attachment 1 indicates that the applicable regulatory authorities or governing bodies responsible for electric service must object or not object to the use of non-consequential load loss prior to a final ERO review and determination if either:

1. The voltage level of the Contingency is greater than 300 kV:
 - a. The Contingency analyzed involves BES Elements at multiple System voltage levels, the lowest System voltage level of the element(s) removed for the analyzed Contingency determines the stated performance criteria regarding allowances for Non-Consequential Load Loss under footnote 12, or
 - b. For a non-generator step up transformer outage Contingency, the 300 kV limit applies to the low-side winding (excluding tertiary windings). For a generator or generator step up transformer outage Contingency, the 300 kV limit applies to the BES connected voltage (high-side of the Generator Step Up transformer)
2. The planned Non-Consequential Load Loss under footnote 12 is greater than or equal to 25 MW.

Once assurance has been received that the applicable regulatory authorities or governing bodies responsible for retail electric service issues do not object to the use of Non-Consequential Load Loss

under footnote 12, the Planning Coordinator or Transmission Planner will submit a request to the ERO for a determination of whether there are any Adverse Reliability Impacts caused by the request to utilize footnote 12 for Non-Consequential Load Loss. The burden to provide a sufficient basis for why the use of Non-Consequential Load Loss under footnote 12 does not result in Adverse Reliability Impacts is on the submitting entity. It is the responsibility of the joint Regional Entity and NERC team to review the submission and make a determination of whether the entity has demonstrated that the use of Non-Consequential Load Loss under footnote 12 does not result in Adverse Reliability Impacts.

The steps outlined here should be followed to ensure a timely, structured, and consistent approach to determining whether any Adverse Reliability Impacts are caused by the request to utilize footnote 12 for Non-Consequential Load Loss.

The entity will work with the Regional Entity designated as its Compliance Enforcement Authority (CEA) as outlined in this process and shown in **Figure 1: Non-Consequential Load Loss Review Process Flow Chart**. For MRREs in Coordinated Oversight, the CEA for this process is the Lead Regional Entity (LRE). The LRE will coordinate with the Affected Regional Entity(ies) (ARE) and the ARE(s) may participate in the joint review as well.

Step 1 – Registered Entity Submittal

If a PC or TP has determined that the use of Non-Consequential Load Loss under footnote 12 is needed as an element of a Corrective Action Plan in Year One of the Planning Assessment and meets the criteria in Attachment 1 Section III.1 or III.2, and assurance has been received that the applicable regulatory authorities or governing bodies responsible for retail electric service issues do not object to the use of Non-Consequential Load Loss under footnote 12, then the entity will contact their Compliance Enforcement Authority (CEA) to coordinate submittal of the necessary information.

The entity shall submit the requisite data through the Align tool in the Periodic Data Submittal portlet; using the Secure Evidence Locker as needed. The CEA will acknowledge receipt of the submission within 15 days and review that all information requested in Align is provided in the entity's submittal. If the submittal is incomplete, the CEA will inform the entity to resubmit and the process will restart. The CEA will notify NERC Compliance Assurance when acknowledging receipt of the submission.

The entity submitting the request may withdraw the request any time prior to the CEA communicating the final determination.

Step 2 – ERO Enterprise Review

The CEA and NERC will form an ERO Enterprise Review Panel (review panel) comprised of not less than four (4) total individuals from the Region and NERC. The review panel will perform a review of the submitted information and develop a preliminary determination of whether any Adverse Reliability Impacts are caused by the request to utilize footnote 12 for Non-Consequential Load Loss within 90 days of its acknowledgement of the receipt of submission. During its review, the review panel may work through the CEA to request additional information from the entity submitting the request.

If the review panel determines it will be unable to complete its review within the established timeframe, the review panel, based on consultation with the managers of NERC Compliance Assurance and NERC Power System Analysis, will establish a revised timeline for completing its review. The revised timeline for review and determination will be provided to the entity by the CEA.

Step 3 – ERO Determination

The review panel will present to the NERC Vice President of Engineering and Standards for approval of the preliminary determination as the ERO determination. The review panel will communicate the ERO determination and rationale to NERC Compliance Assurance and the CEA.

The CEA will then communicate the ERO determination in writing to the entity along with the rationale for the determination within 30 days of NERC's Vice President of Engineering and Standards receiving the review panel's preliminary determination.

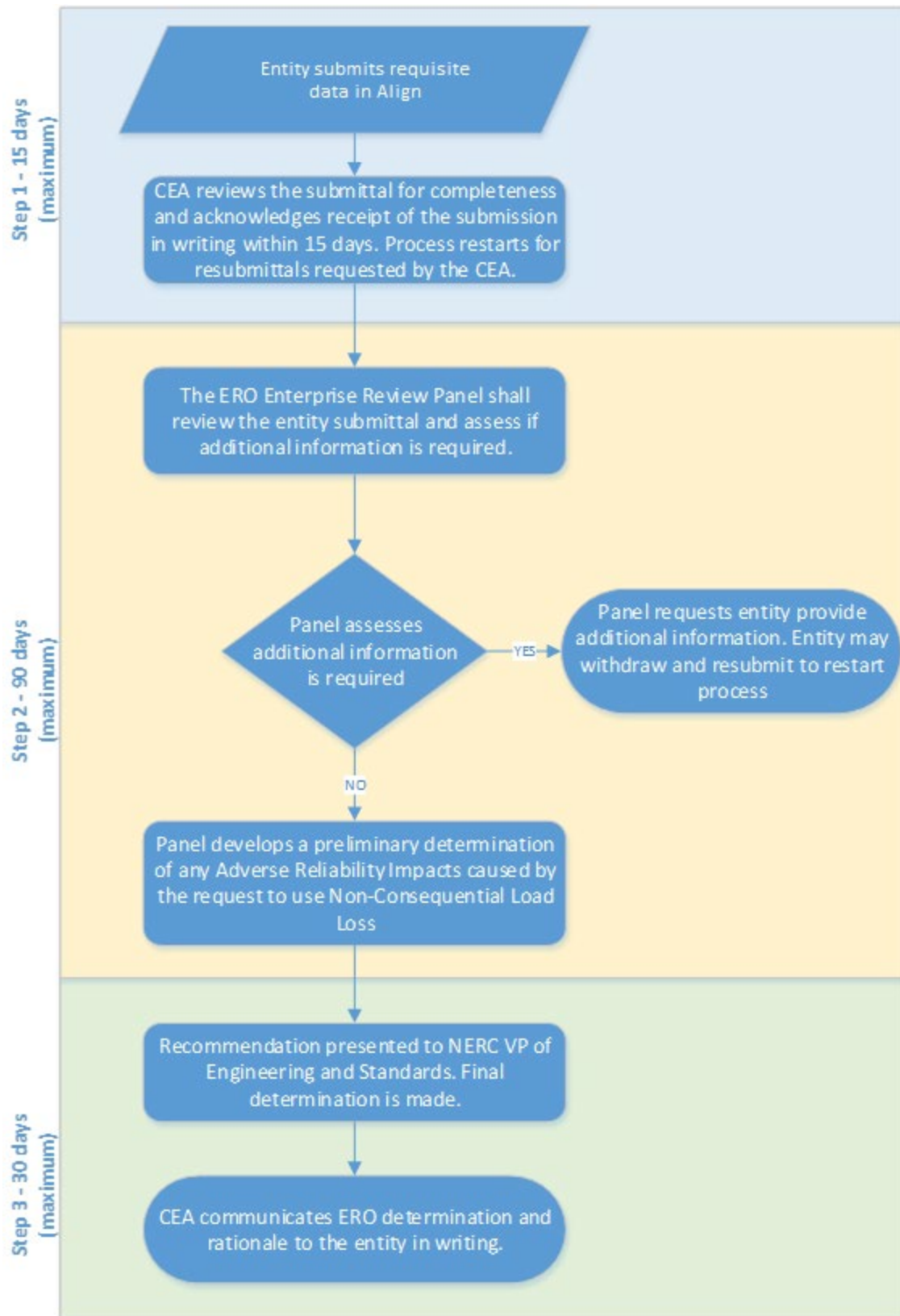


Figure 1: Non-Consequential Load Loss Review Process Flow Chart

Appendix C: TPL-007-4 CAP Extension Request Review Process

Background

This Electric Reliability Organization (ERO) Enterprise TPL-007-4 Corrective Action Plan (CAP) Extension Review Process document addresses how ERO Enterprise Compliance Monitoring and Enforcement staff (CMEP staff) will jointly review requests for extensions to CAPs developed under TPL-007-4 to ensure a timely, structured and consistent approach to CAP extension request submittals and processing.

NERC Compliance Assurance will maintain this document under existing ERO Enterprise processes. This document will be reviewed and updated by NERC Compliance Assurance, as needed.

Process Overview

If a registered entity (entity) has determined that a Corrective Action Plan (CAP) developed in accordance with TPL-007-4 Requirements R7 or R11 cannot meet the timetable provided per R7 Part 7.3 or R11 Part 11.3 due to situations beyond the control of the responsible entity, then the entity will submit an extension request to the ERO Enterprise for approval prior to the original required CAP completion date.

The steps outlined here should be followed to ensure a timely, structured, and consistent approach to extension request submittals and processing.

The entity will work with the Regional Entity designated as its CEA as outlined in this process. The entity submitting the extension request will be referred to as the 'submitting entity' and may represent only itself or multiple registered entities who have developed a joint extension request. The submitting entity is responsible for ensuring all registered entities who are jointly submitting the extension request are listed in the requested information below and for distributing any communications from its CEA to the other entities that are part of the joint extension request. If a joint extension request is submitted for multiple registered entities who have different Regional Entities designated as the CEA, the submitting entity's CEA will perform the steps outlined in this process and will be responsible for coordinating with the Regional Entity(ies) that are the designated CEA for the additional entities party to the joint extension request.

For entities in Coordinated Oversight, the CEA for this process is the Lead Regional Entity (LRE). The LRE will coordinate with the Affected Regional Entity(ies) (ARE) and the AREs may participate in the joint review as well.

Step 1 – Registered Entity Submittal

If an entity determines that it cannot meet the required timetable for completing a CAP, the submitting entity will contact their CEA to coordinate submittal of an extension request. The submitting entity will submit the requisite data to their CEA through Align and the Secure Evidence Locker as needed.

Entities are encouraged to submit the extension request as soon as they are aware they will not meet the CAP completion date but no later than 60 days before the original required completion date to allow the CEA and NERC time to approve the extension request before the original required completion date.

If CAP extension requests are submitted less than 60 days before the original required completion date, the CEA and NERC may not have sufficient time to review the extension request before the required completion date. This could cause the entity not to meet its obligations under TPL-007-4 R7 Part 7.3 and R11 Part 11.3. It is the submitting entity's responsibility to ensure that all information detailed in TPL-007-4 Part 7.4 or 11.4 and requested in Align is provided in the entity's extension request submittal to facilitate the CEA and NERC review.

Step 2 – ERO Enterprise Review

The CEA will acknowledge receipt of the submission in writing within 15 days and review that all information detailed in TPL-007-4 R7 Part 7.4 or R11 Part 11.4 and requested in Align is provided in the submitting entity's extension request submittal. The CEA will work with the submitting entity to provide any missing information and will notify NERC of the extension request submittal when acknowledging receipt of the submission.

CMEP staff from the CEA and NERC will then perform a joint review of (1) the situation(s) beyond the control of the entity preventing implementation of the CAP within the identified timetable; and (2) the revisions to the CAP and updated timetable for implementing the selected actions. Any additional information requested to support the extension request review will be coordinated with the submitting entity by the CEA. The CEA and NERC will complete the review within 45 days or provide notification to the submitting entity that they are extending the time needed for review.

The Standard language states that an entity will submit an extension request for a full or partial delay in the implementation of the CAP within the timetable provided in TPL-007-4 R7 Part 7.3 or R11 Part 11.3. The determination whether to approve the extension request will be based on the specific facts and circumstances provided as to how the situations causing the delay in completing the CAP are beyond the control of the entity.

Examples of situations beyond the control of the responsible entity include, but are not limited to:

- Delays resulting from regulatory/legal processes, such as permitting;
- Delays resulting from stakeholder processes required by tariff;
- Delays resulting from equipment lead times; or
- Delays resulting from the inability to acquire necessary Right-of-Way.

Due diligence to order equipment, plan Right-of-Ways, obtain permits, etc., will be considered as part of the determination of whether a particular set of facts and circumstances constitute situations beyond the control of the entity. Additionally, cost may be a factor in whether a particular set of facts and

circumstances constitute situations that are beyond the control of the entity. However, the cost of mitigation alone is not likely to be determined to be a situation that is beyond the control of the entity.

Step 3 – Registered Entity Notification

The CEA will communicate the approval or denial of the extension request or continuation of the time needed to review the extension request in writing to the submitting entity including the rationale for the determination. For any continuation of the review, the CEA will also provide the submitting entity a revised timeline for when the determination will be provided.

Revision History

Version	Date	Revision Details
1.0	10/13/21	-Initial Version – Updated from 2021 ERO Enterprise PDS Submittal Schedule
1.1	12/16/21	Updated language page 1, paragraph 1 for reporting flexibility