

**RELIABILITY FIRST**

Feb. 1, 2023

To: ReliabilityFirst Compliance Contacts  
Subject: RF Compliance Program Update Letter – February 2023



## **LAST CALL! Internal Controls Workshop returns in February**

RF's Internal Controls Workshop is back! Your reliability and security journey continues Feb. 23, 2023 in the Cleveland area! Entity PCCs and SMEs are encouraged to attend, however each PCC is required to bring at least one SME with them.

During this workshop, we will deep dive into internal controls with short lectures and collaborative group activities to facilitate an understanding of the principles behind each. We will focus on the five components of the COSO Internal Controls Framework and scenarios will concentrate on FAC-008, CIP-005 and CIP-007 risks.

The one-day workshop is free to attend with a reception to follow. Registration and room block information is available [here](#).

## **NEW! NERC Updates CIP Evidence Request Tool (ERT) and User Guide v7.0**

NERC posted a revised ERO Enterprise CIP Evidence Request Tool (ERT), which is a common request for information tool for CIP Compliance monitoring engagements. The purpose of the CIP ERT is to help the ERO Enterprise with consistency and transparency in its audit approach. It will also help

responsible entities (especially those that operate in multiple regions) fulfill these requests more efficiently, by understanding what types of evidence are useful in preparation for an audit.

Click here for: [CIP Evidence Request Tool & User Guide v7.0](#)

## **NEW! EOP-011-2 Effective Date and Implementation Plan**

The effective date of EOP-011-2 (Emergency Preparedness and Operations) is April 1, 2023.

Questions have been asked about when a Generator Owner (GO) needs to have performed the “Annual inspection and maintenance of generating unit(s) freeze protection measures” per Requirement R7 Part 7.2, as well as when the training referenced in Requirement R8 needs to be provided.

Within the [Implementation Plan](#) is a section named: “Initial Performance of Periodic Requirements,” and it states: “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.”

Consistent with this information in the Implementation Plan, **applicable Registered Entities are required to have performed the initial annual inspection and maintenance of generating unit freeze protection measures under Requirement R7 Part 7.2 and have provided the generating unit specific training for its maintenance and operations personnel under Requirement R8 by April 1, 2023.**

A Registered Entity may revise their cold weather preparedness plan(s) as deemed appropriate. Any revisions should be incorporated into the next performance of the “annual inspection and maintenance of generating unit(s) freeze protection measures” per Requirement 7 Part 7.2 and into the training per Requirement R8.

A [draft Reliability Guideline](#) (Generating Unit Winter Weather Readiness – Current Industry Practices – Version 4) is available for reference. The comment period for this draft Reliability Guideline closed on Jan. 27, 2023. Please watch for the final version of this Reliability Guideline.

Finally, NERC is planning to host a General Session Live Webinar March 7, 2023, to discuss cold weather preparedness Standards and possible compliance concerns. Please watch for an announcement from NERC for details.



## Align Update – February

Please read the [January 2023 Align Registered Entity Newsletter](#) attached to this email. It includes valuable updates and new information about Release 4.5 (IRA and COPs) and related training, data migrations from Legacy Systems (CDMS), Transition to Governance Model, and much more.

RF is currently executing a data migration plan with NERC to move existing Open Enforcement Actions from webCDMS to Align. Once the migration is complete, we will have to perform data validation before retiring webCDMS permanently. RF intends to retire webCDMS on March 31, 2023.

**RF encourages our Registered Entities to migrate any historical data needed for their records from webCDMS as soon as possible and prior to Mar. 31.**

As a reminder, if Registered Entities have any suggestions or other feedback that they would like to share about Align they can email [AskAlign@nerc.net](mailto:AskAlign@nerc.net). NERC also has created an Align User Group (AUG) which is a hybrid group consisting of individuals representing the Entities, Regions and NERC. There are three Stakeholder Compliance and Certification Committee (CCC) members assigned to the AUG which represent Entities. If you have any additional feedback on Align, please provide that feedback to any of the CCC AUG representatives. The AUG uses the Align Project Governance Model to outline its roles and responsibilities.

## NERC Training 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](mailto:AskAlign@nerc.net).



## **NEW!** Upcoming Changes to Functional Mapping in CORES

### Upcoming Enhancements

- **Functional Mapping capabilities in CORES will be improved and have several expected benefits, which include:**
  - New “acknowledgment” functionality
  - New notifications for both registered entities; and the ERO Enterprise
  - Improved user interfaces
  - Improved data entry controls
  - Improved data architecture
  - Consolidate existing data from other systems and applications

### Implementing in 2023

- **Phase 1**
  - Webinar – Data Verification and Data Entry
  - Training videos, user guides and updated registration procedure
  - Industry wide software release – Verification and Data Entry Workshops
  - Completion of Data Verification; Data Entry Period Continues
- **Phase 2**
  - Webinar – Data Acknowledgement
  - Industry wide software release – Acknowledgement
  - Completion of Data Acknowledgement Period
- **Phase 3**
  - Targeted Outreach and Data Entry and Acknowledgement Continues for Registration Changes

The Functional Mapping process is used to identify critical functional relationships between registered entities. During the registration process, the ERO Enterprise performs a review of functional relationships identified by the NERC Rules of Procedure (ROP), certain Reliability Standards and other important entity relationships.

CORES Functional Mapping functionality is used to record the relationships between registered entities by their function, which may also be used by registered entities for compliance purposes. NERC standards also use the registered functions to create compliance relationships. When registered entities map to each other, they ensure there are no gaps in their compliance nor functional registration. The ERO Enterprise also uses functional mapping information for ensuring that there are not any gaps in registration, for determining entity risk and for other CMEP activities.

**REMEMBER – UPDATE COMPLIANCE CONTACT INFORMATION in CORES and webCDMS**

Registered Entities are reminded to periodically review and update your Compliance Contacts information as changes occur. Updating contact information is critical to ensure that our contact data remains fresh, accurate and current always.

**Please verify the names, addresses, phone numbers (cell) and email addresses for each Primary Compliance Contact (PCC), Primary Compliance Officer (PCO/AO) and Alternate Compliance Contact (ACC) in RF webCDMS and CORES systems.**

This helps ensure our Compliance Contact data is consistent in both systems. This process will continue until further notice or until the RF legacy CDMS system is retired (March 31, 2023).

## NERC Registration and Certification News and Updates

### **REMINDER! Reporting Changes to Entities Registration Status to RF**

RF wants to remind our Registered Entities of the importance of following the rules as set forth in the NERC Rules of Procedures for establishing and maintaining the NERC Compliance Registry (NCR) based upon the Registration criteria as set forth in **Appendix 5B *Statement of Registry Criteria***.

More specifically, we want to stress the importance of Section 500 of the ROP Page 42, section 1.3.5 that states **“Each Registered Entity identified on the NCR shall notify its corresponding Regional Entity(s) of any corrections, revisions, deletions, changes in ownership, corporate structure, or similar matters that affect the Registered Entity’s responsibilities with respect to the Reliability Standards.** Failure to notify the Region will not relieve the Registered Entity from any responsibility to comply with the Reliability Standards or shield it from any Penalties or sanctions associated with failing to comply with the Reliability Standards applicable to its associated Registration.”

Please notify RF Registration ([compliance@rfirst.org](mailto:compliance@rfirst.org)) of any new registrations, deregistrations, or pending changes to an entity’s existing registration status, to assets or ownership prior to the effective dates of the change. RF asks Entities to provide at least 30 days advance notice as this will give us ample time to review and understand the requested changes and assess any impacts to Registration and assist you with making the appropriate changes in CORES and other Regional tools.



## Monthly Technical Talk with RF Call



**The next Tech Talk with RF will be held on **Monday, Feb. 13**, from **2-3:30 p.m. EST**.**

ReliabilityFirst (RF) offers a regularly scheduled monthly call to provide entities and stakeholders with a forum for addressing topics and questions relevant to reliability, resilience and security. These calls are typically held on the third Monday of each month from 2 p.m. to 3:30 p.m. EST, **however this call is moved up one week earlier**, due to Presidents' Day.

While RF Subject Matter Experts (SMEs) will provide presentations and updates, they will not address entity-specific questions and issues. These types of questions can be handled offline by using the RF [Assist Visit Program](#). If you have any questions, please reach out to Michelle Cross, Entity Engagement Manager, via [email](#) or 216-503-0603.

Monday, Feb. 13, 2023

2 p.m. – 3:30 p.m. EST (US & Canada)

<https://reliabilityfirst.webex.com/reliabilityfirst/j.php?MTID=mfdb730a90af10d3408262aa0af6f7e85>

Meeting Number: 2318 475 5074

Meeting Password: 0123456789

Join by phone: 1-650-479-3207, Access Code: 2318 475 5074

Please join us on Slido.com using **#TechTalkRF** as the event code

### Agenda Topics

#### CIP Themes Roundtable Discussion

Facilitator – Tom Scanlon – Managing Enforcement Counsel, RF

Panelists:

- Lew Folkerth – Principal Reliability Consultant, External Affairs, RF
- Tony Freeman – Principal Analyst, Risk Analysis & Mitigation, RF
- Zack Brinkman – Manager, CIP Compliance Monitoring, RF
- Robert Vaughn – CIP Auditor, SERC

RF will be hosting a roundtable discussion to dive into CIP themes we have witnessed from recent audits, self-reports and outreach activities. The questions posed to our panel will focus on the themes of document management, key personnel and cyber/physical security best practices. If you



have questions that you would like to submit in advance to our panel, please contact [Brian Thiry](#). We will also be taking questions through the SLIDO ([slido.com #TechTalkRF](#)) during the live event.

This panel discussion is open to all cybersecurity professionals, including compliance personnel, internal control champions, OT/IT support including SCADA/EMS personnel, physical security specialists, leaders of these departments and anyone interested in learning about actionable ways to improve your company's security posture.

**For all Technical Talk with RF calls:** [WebEx dial-in details](#) will be posted on a monthly basis to the RF website. Please contact [Michelle Cross](#), Manager External Affairs, with any questions, suggestions or topics of interest for future calls.

## 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 [training.nerc.net](#).

If you are unable to resolve the issue on your own, place a ticket using the NERC Helpdesk Ticket Submission System: [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.

## **NEW! GADS Data Reporting Instructions for Wind and Solar Posted to NERC Website**

The GADS Section 1600 Data Request for Wind and Solar becomes effective on Jan. 1, 2024. Data Reporting Instructions for the GADS [Section 1600 Data Request](#) have been posted on the Section 1600 Data Request page of the NERC website. Industry, Regional Entity, and NERC staff collaborated to develop these Data Reporting Instructions.

<b>2023 Upcoming Standards Subject to Future Enforcement</b>		
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

<b>2024 Upcoming Standards Subject to Future Enforcement</b>		
CIP-004-7	Cyber Security – Personnel & Training	Jan. 1, 2024
CIP-011-3	Cyber Security – Information Protection	Jan. 1, 2024
FAC-001-4	Facility Interconnection Requirements	Jan. 1, 2024
FAC-002-4	Facility Interconnection Studies	Jan. 1, 2024
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)	Jan. 1, 2024
FAC-003-5	Transmission Vegetation Management	April 1, 2024
FAC-011-4	System Operating Limits Methodology for the Operations Horizon	April 1, 2024
FAC-014-3	Establish and Communicate System Operating Limits	April 1, 2024



IRO-008-3	Reliability Coordinator Operational Analyses and Real-time Assessments	April 1, 2024
PRC-023-5	Transmission Relay Loadability   Implementation Plan	April 1, 2024
PRC-002-3	Disturbance Monitoring and Reporting Requirements   Implementation Plan	April 1, 2024
PRC-026-2	Relay Performance During Stable Power Swings   Implementation Plan	April 1, 2024
TOP-001-6	Transmission Operations	April 1, 2024

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

### Periodic Data Submittals Due in February 2023

3/01/2023	PRC-004	GO, TO, DP	Protection System Misoperations - Section 1600 data request for Q4-2022 (Oct. 1 – Dec. 31). <b>Submit in MIDAS portal.</b>
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### Periodic Data Submittals Due in March 2023

3/31/2023	PRC-023	GO, TO, DP, PA/PC	PRC-023-4 - Transmission Relay Loadability – Annual Data Submittal ( <b>Submissions to be made in Align</b> )
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## ERO Enterprise Periodic Data Submittals Schedule

### 2023 Consolidated ERO Enterprise Periodic Data Submittals Schedule

#### Background

The Compliance Enforcement Authority (CEA) requires Periodic Data Submittals 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 4.6. 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. Some of the below reporting dates may be impacted as potential enhancements to PDS functionality in Align are 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 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 4.8. 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
<a href="#">BAL-003-2</a> <sup>1</sup>	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
<a href="#">EOP-004-4</a> <sup>2</sup>	R2	NERC	Per Standard	Event Driven
<a href="#">EOP-008-2</a>	R8	RE	Per Standard	Within six calendar months of the date when the functionality is lost

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

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

<b>ERO Enterprise Data Submittal Schedule</b>				
<b>ERO-Wide Data Submittal Schedule</b>				
<b>Reliability Standard</b>	<b>Requirement(s)</b>	<b>Submit To</b>	<b>Submittal Frequency</b>	<b>Proposed Due Dates</b>
<a href="#">FAC-003-4</a>	C.1.4	RE	Quarterly	20 days after the end of the quarter
<a href="#">PRC-002-2</a>	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
<a href="#">PRC-023-4</a>	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.
<a href="#">PRC-023-4</a>	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
<a href="#">TPL-001-4<sup>3</sup></a> <a href="#">TPL-001-5.1</a>	Multiple See Footnote 12	RE	Per Standard	After the PC or TP receives assurance that 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.
<a href="#">TPL-007-4</a>	R7.4	RE	Per Standard	Within a timely manner following the identification of the responsible entity being unable to implement the CAP within the timetable submitted for Part 7.3 and prior to the end date of the submitted timetable
<a href="#">TPL-007-4</a>	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
<b>RE-Specific Data Submittal Schedule</b>				
<b>Reliability Standard</b>	<b>Requirement(s)</b>	<b>Submit To</b>	<b>Submittal Frequency</b>	<b>Proposed Due Dates</b>
<a href="#">BAL-001-TRE-2</a>	R1	Texas RE	Per Standard	Within 14 calendar days after each Frequency Measurable Event
<a href="#">BAL-001-TRE-2</a>	R2.2	Texas RE	Per Standard	By the end of the month in which the Primary Frequency Response calculation results were completed

<sup>3</sup> TPL-001-4 becomes inactive on June 30, 2023 and will be replaced by TPL-001-5.1 on July 1, 2023.

## Appendix A: Full Requirement Text or Subpart

Reliability Standard	Requirement(s)	Full Text of Requirement or subpart
<a href="#">BAL-003-2</a>	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.
<a href="#">EOP-004-4</a>	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).
<a href="#">EOP-008-2</a>	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.
<a href="#">FAC-003-4</a>	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"> <li>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.</li> </ul> <p>A Sustained Outage is to be categorized as one of the following:</p> <ul style="list-style-type: none"> <li>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;</li> </ul>

Reliability Standard	Requirement(s)	Full Text of Requirement or subpart
		<ul style="list-style-type: none"> <li>• Category 1B — Grow-ins: Sustained Outages caused by vegetation growing into applicable lines, but are not identified as an element of an IROL or Major WECC Transfer Path, by vegetation inside and/or outside of the ROW;</li> <li>• 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;</li> <li>• 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;</li> <li>• Category 3 — Fall-ins: Sustained Outages caused by vegetation falling into applicable lines from outside the ROW;</li> <li>• 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;</li> <li>• 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.</li> </ul> <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>
<a href="#">PRC-002-2</a>	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"> <li>• Restore the recording capability, or</li> <li>• Submit a Corrective Action Plan (CAP) to the Regional Entity and implement it.</li> </ul>
<a href="#">PRC-023-4</a>	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>
<a href="#">PRC-023-4</a>	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</p>

Reliability Standard	Requirement(s)	Full Text of Requirement or subpart
		establishment of the initial list and within 30-calendar days of any changes to that list.
<a href="#">TPL-001-4</a> <a href="#">TPL-001-5.1</a>	Multiple See Footnote 12	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 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.
<a href="#">TPL-007-4</a>	R7.4	<p>The CAP shall:</p> <p><b>R7.4</b> 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"> <li>• 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;</li> <li>• 7.4.2. Revisions to the selected actions in Part 7.1, if any, including utilization of Operating Procedures, if applicable; and</li> <li>• 7.4.3. Updated timetable for implementing the selected actions in Part 7.1.</li> </ul>
<a href="#">TPL-007-4</a>	R11.4	<p>The CAP shall:</p> <p><b>R11.4</b> 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"> <li>• 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;</li> <li>• 11.4.2. Revisions to the selected actions in Part 11.1, if any, including utilization of Operating Procedures, if applicable; and</li> <li>• 11.4.3. Updated timetable for implementing the selected actions in Part 11.1.</li> </ul>
<a href="#">BAL-001-TRE-2</a>	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

Reliability Standard	Requirement(s)	Full Text of Requirement or subpart
		FME information (time of FME (t(0)), pre-perturbation average frequency, post-perturbation average frequency) publicly available.
<a href="#">BAL-001-TRE-2</a>	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<sup>4</sup>

## Use of Footnote 12 for Non-Consequential Load Loss Review Process

### Background

This Electric Reliability Organization (ERO) Enterprise<sup>5</sup> 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.

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<sup>4</sup> TPL-001-4 becomes inactive on June 30, 2023 and will be replaced by TPL-001-5.1 on July 1, 2023. Appendix B shall remain as written.

<sup>5</sup> 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***

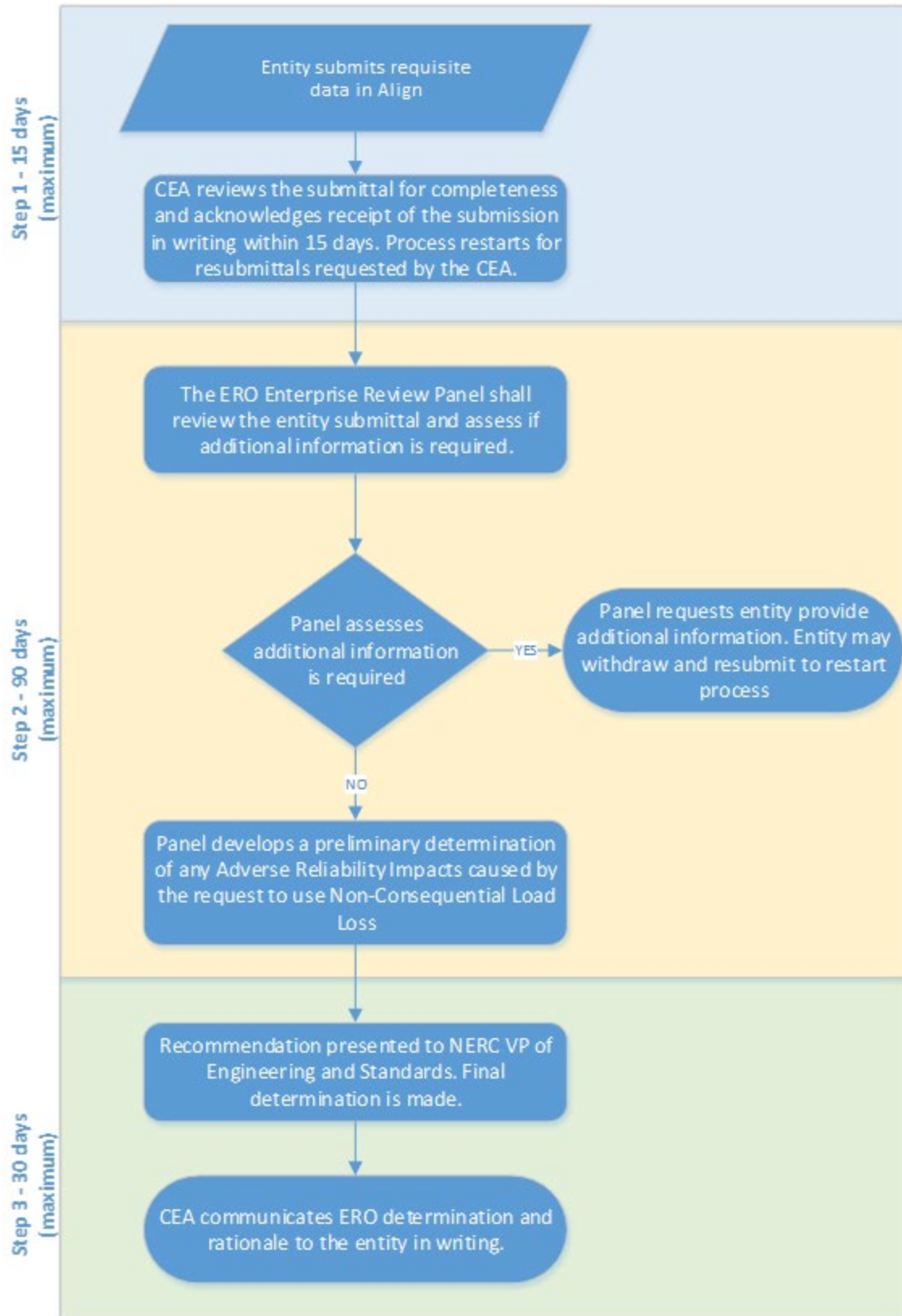
The CEA and NERC will form an ERO Enterprise Review Panel (review panel) comprised of not less than four (4) total individuals from the Region and NERC. The review panel will perform a review of the submitted information and develop a preliminary determination of whether any Adverse Reliability Impacts 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	08/01/2022	-Initial Version – Updated from 2022 ERO Enterprise PDS Submittal Schedule

**NERC**

NORTH AMERICAN ELECTRIC  
RELIABILITY CORPORATION

# ALIGN

## Registered Entity Newsletter

January 2023

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**LET'S GET ALIGNED: KEY TAKEAWAYS**

**Release 4.5 Update and Training**

On November 16, 2022, the Align project team deployed Release 4.5 into production. This is the final release planned under the current business case and includes features to enable development of inherent risk assessments (IRAs) and compliance oversight plans (COPs). Training for Release 4.5 is scheduled to begin in January 2023 (subject to change).

Release 4.5 Milestones	
Milestone	Due Date
IRA/COP Train the Trainer	2/9/23
IRA Pilot in Production	3/31/23
COP – Collaborative Testing in UAT	3/31/23
IRA-Use Full Time	4/3/23
COP Pilot In Production	6/30/23

Future releases of Align will be handled under the governance model (discussed further [here](#)). The project team will transition into this governance model, and all future priorities will be managed by the Align User Group (AUG), Align Product Management Team (PMT), and the Operations Leadership Team (OLT).

**Data Migrations from Legacy Systems**

The project team will now focus on data migrations from legacy systems (webCDMS and CITS) with the data team (a sub-group of the Align project team) executing a data migration plan in partnership with each Region. This data will include a subset of past scheduled engagements as well as closed and open violations; however, not all historical data will be migrated. The data migration is the final element to completing the scope outlined in the Align business case.

Data Migrations	
Region	Migration Date
MRO	March 2023
NPCC	February 2023
ReliabilityFirst	February 2023
SERC	January 2023
Texas RE	Complete
WECC	Complete

The data migration schedule has been revised since the last Align newsletter. Closed violations will be completed after all open violations are migrated.

**Canadian Jurisdictions’ Use of Align**

The Align project team continues to work with those Regional Entities that support Canadian regulators—MRO, NPCC, and WECC—to execute project plans and activities in support of Canadian Align usage. These activities include determining detailed requirements by province, importing provincial standards data into Align, and defining the appropriate user roles.

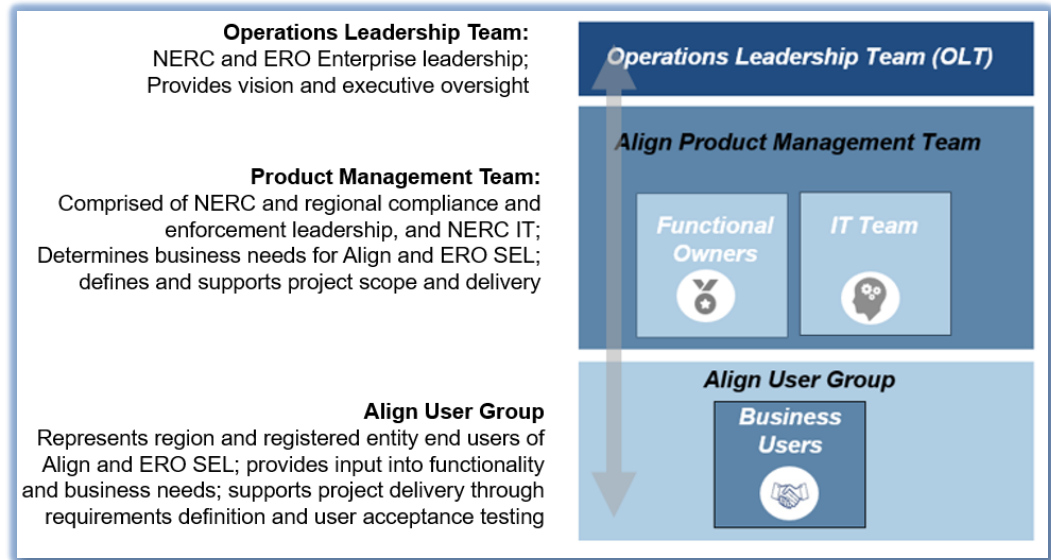
The requirements definition work is completed, but the production deployment schedules are still in flight.

### Transition to Governance Model

As mentioned in a previous edition of the Align newsletter, future releases of Align and the ERO SEL will come under the governance model. The model, approved by the Align Steering Committee, consists of three tiers: OLT, PMT, and AUG.

Registered entity insight and input is gathered through Compliance and Certification Committee (CCC) representation on the AUG. The CCC provides three representatives on the AUG and seeks stakeholder input on Align and SEL priorities.

The full governance model can be found on [here](#) on the Align project page.



**Figure 1.1: Governance Model**

Align User Group Members	
Organization	Members
CCC Representatives	Jennifer Flandermeyer, Scott Tomashefsky, Silvia Parada-Mitchell
MRO	Janice Anderson, Marissa Falco
NERC	Cas Nowicki, Dan Chanda, Sara Minges, Jamie Calderon
NPCC	Aaron Hornick, Thomas Butler
ReliabilityFirst	Elizabeth Rettig, Patrick O'Connor
SERC	Richard Dodd, Shawna Speer
Texas RE	Curtis Crews, Kaitlin Van Zee
WECC	Holly Peterson, Angela Shapiro

## Accessing Align

Appropriate access to the system is very important to maintain data security. An active ERO Portal Account is required to access Align and the ERO Secure Evidence Locker (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 materials for Align and the ERO SEL. Please reach out to your AUG members for additional materials.

Quick Links
<a href="#">FAQs</a>
<a href="#">ERO Enterprise BES Artifacts Submittal Exception Process</a>
<a href="#">Registered Entity SEL Requirements</a>
<a href="#">NERC Training Site</a>
<a href="#">CEA SEL User Guide</a>
<a href="#">Release 1 CEA User Guide</a>
<a href="#">Release 2 CEA User Guide</a>
<a href="#">Release 3 CEA User Guide</a>
<a href="#">Release 4 / Release 4.5 CEA User Guides</a>
<a href="#">Registered Entity User Access Guide</a>
<a href="#">Data Handling Guide to Align and ERO SEL</a>
<a href="#">Align Business Case</a>

**Want to Learn More?**

Please submit questions to [AskAlign@NERC.net](mailto:AskAlign@NERC.net) or reach out to your Regional AUG member.

**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](mailto:AskAlign@nerc.net) with feedback on this newsletter. Current newsletters and additional project resources, including the regularly updated [Align FAQs](#), can be found on the [Align Project Site](#).