



**RELIABILITY FIRST**

June 7, 2023

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



## **NEW! RF Announces Fall Workshop Sept. 26-27 in Pittsburgh, PA**

The RF Fall Workshop will be held Sept. 26-27 at the Omni William Penn Hotel in Pittsburgh, PA. There will be CIPC and CUG meetings the morning of Sept. 26, followed by lunch at noon. During this workshop, we will discuss the importance of collaboration and partnerships to the electric industry amid the challenges of an ever-changing generation mix and the great energy transition. We will examine these interdependencies, with speakers from state government, natural gas, cybersecurity and water industries. Plus, we'll have important updates from FERC, NERC, RF CMEP staff and more.

Day #1 of the workshop will be 12 to 5 p.m. and include speakers from different critical infrastructures, plus an update from FERC, followed by an evening reception.

Day #2 of the workshop will be 8 a.m. to 12 p.m. and focus on new NERC standards and internal controls.

**REGISTER NOW** at [RF 2023 Fall Workshop Registration](#)



## RF Announces 2023 RF Protection System and Human Performance Workshops

Please mark your calendars for the upcoming ReliabilityFirst Protection System and Human Performance Workshops. These will be held virtually. The agenda and additional information are currently being developed and will be available soon. If you have any questions, please contact [John Idzior](#) or [Thomas Teafatiller](#).

Protection System Workshop - [Register](#)  
Aug. 2, 2023 | 1 - 5 p.m.

Human Performance Workshop - [Register](#)  
Aug. 3, 2023 | 8 a.m. - 12 p.m.

## **NEW!** Entity Profile Questionnaires (EPQ) Update

RF did not send our Registered Entities notifications to refresh their **Q2- 2023** EPQ data in MKInsight (MKI) due to the anticipated transition over to Align. Entities may, at their own discretion, update EPQ data in MKI for the time being, but this is optional and is not required at this time.

**Please note – with the new Align Release 4.5 (Inherent Risk Assessment and Compliance Oversight Plan) Functionality being rolled out later this year (which includes questionnaire functionality), the Feb. 2023 EPQ Annual refresh was the last update to EPQ questionnaire completed in MKInsight. Entity training for the new Align Release 4.5 functionality is forthcoming.**

## **GridSecCon 2023 Registration is Open**

Make Plans to Attend GridSecCon – Oct. 17-20 in Quebec City, Canada

NERC, the E-ISAC, and Northeast Power Coordinating Council (NPCC) are co-hosting the 12<sup>th</sup> annual grid security conference on Oct. 18 – 20 with training opportunities on Oct. 17 in Québec City, Canada. GridSecCon brings together cyber and physical security leaders from industry and government to deliver expert training sessions, share best practices and effective threat mitigation programs, and present lessons learned. For more information about GridSecCon please contact [events@eisac.com](mailto:events@eisac.com).

**Register here for [GridSecCon](#).**



## **NEW! Align Planned Maintenance**

The ERO Enterprise has scheduled the Align system to be down for planned maintenance. The Align system will be down for scheduled maintenance at 11 a.m. Eastern (8 a.m. Pacific) through 4 p.m. Eastern (1 p.m. Pacific) on June 10, 2023. This planned outage only affects Align. Information regarding this outage will also be displayed on the My Align News & Update section of Align, and the Align and SEL web page.

## **NERC Align 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](#).

## 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](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: [support.nerc.net](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, issues, and tickets as promptly as possible during normal business hours.



### **REMEMBER – UPDATE COMPLIANCE CONTACT INFORMATION in CORES**

Registered Entities are required to review and update their 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) and Alternate Compliance Contact (ACC) in the ERO Portal/CORES system.**

### **NEW! NERC Webinar Series: Inverter-Based Resources**

**June 6 – July 13, 2023 | 4 – 5 p.m. Eastern Time**

**Register here for the series - [Webinar Registration Link](#)**

Join NERC for an 11-part webinar series discussing bulk power system (BPS)-connected inverter-based resources (IBR) and NERC's risk mitigation strategy in this area. The series will provide a complete overview of IBRs – from a fundamental understanding of IBR technology to tackling the more complex and emerging risk issues. Each webinar will include panelist presentations followed by questions and answers, with topics including:



- IBR performance issues, NERC disturbance analysis process and findings
- The interconnection process and establishing and enhancing interconnection requirements
- Modeling IBRs – model requirements, unit and facility model creation process, model benchmarking, and electromagnetic transient modeling
- IBR commissioning processes and lessons learned
- NERC IBR registration, Reliability Standards enhancements, and IBR Risk Mitigation Strategy

## **NEW! Section 1600 Data Request for Internal Network Security Monitoring**

Pursuant to NERC Rules of Procedure Section 1600, NERC is requiring responses to a data request regarding internal network security monitoring. This data request is in response to a FERC directive in Order No. 887 to conduct a study on the risks in having a lack of internal network security monitoring and the challenges to implementing them for medium impact Bulk Electric System (BES) Cyber Systems without External Routable Connectivity and for all low-impact BES Cyber Systems. Registered entities have 60 days to provide finalized responses. One response is required for each NERC Compliance Registry (NCR).

Primary Compliance Contacts (PCC) for reporting entities must respond by logging onto the NERC [ERO portal](#) and selecting “INSM Data Request” at the top of the page. If you do not see an “INSM Data Request” option at the top of the page, you are not a PCC for a reporting entity. For those NCRs that have more than one PCC, all PCCs will have access to the response. Responses can be saved and modified repeatedly but once submitted the responses are final. Portal responses are protected and available to ERO study participants on a need-to-know basis only. More information, including the complete data request, is available [here](#). Any questions may be directed to [INSM\\_DR\\_Info@nerc.com](mailto:INSM_DR_Info@nerc.com).



### **Monthly Technical Talk with RF Call**

**The next Tech Talk with RF will be held on **Monday, June 12**, 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 to 3:30 p.m. EST, however this call is moved forward one week due to the Juneteenth holiday.

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 Mike Hughes, Entity Engagement Manager, 216-503-0617.

When: Monday, June 12, 2023

Time: 2 p.m. – 3:30 p.m. EST (US & Canada)

<https://reliabilityfirst.webex.com/reliabilityfirst/j.php?MTID=mdd45fb6c5e18242a1fce5acf0ff37ab8>

Meeting Number: 2313 634 4097

Meeting Password: 0123456789

Join by phone: 1-650-479-3207, Access Code: 2313 634 4097

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

## Agenda Topics

### **RF Summer Assessment**

Tim Fryfogle, Principal Engineer, Engineering and System Performance, RF

- Tim will share the results of RF's 2023 Summer Assessment. He will discuss resource adequacy, peak loads, risk conditions, mitigations and take a look forward to the summer and the challenges it may bring for reliability, resilience, and security.
- This presentation is especially relevant for state decision and policy makers, transmission planners, operations personnel including control room managers and engineers who run Operational Planning Analysis, and anyone interested in the risks that the RF region may encounter this summer.

### **Value of EV Managed Charging to Bulk Power Systems**

Luke Lavin, Researcher III, Grid Planning and Analysis Center, National Renewable Energy Laboratory (NREL)

- When and where electric vehicle (EV) charging occurs has significant implications for power systems supporting widespread EV adoption, especially with high shares of wind and solar generation. Lavin conducted a study focusing on how the value of EV managed charging can shift, depending on the following factors:

- Charging flexibility type (within-charging session or within-week scheduling)
- Dispatch mechanism (direct load control or one of several price-based mechanisms)
- Managed charging participation rate
- Lavin will discuss findings from this study on distributed resource aggregation, price-based charging of EVs and correlation to participation, and the relationship between managed charging of EVs and bulk power system costs.
- This presentation is especially relevant for state decision and policy makers, transmission and distribution planners, operations personnel, including control room managers and engineers who run Operational Planning Analysis, and anyone interested in the impact of EV charging on the electric grid.
- Related reading: The report "[Electric Vehicle Dynamic Charging Performance Characteristics during Bulk Power System Disturbances](#)" from the California Mobility Center, NERC and WECC highlights the need for ongoing collaboration between electric utilities and the EV industry to ensure the reliability of the electric system.

**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 ERO Align system. Contact [Shirley Ortiz](#), Senior Paralegal, at (216) 503-0674 with any questions concerning self-reports.

### 2023 Upcoming Standards Subject to Future Enforcement

TPL-001-5.1	Transmission System Planning Performance Requirements	July 1, 2023
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### 2024 Upcoming Standards Subject to Future Enforcement

CIP-004-7	Cyber Security – Personnel & Training	Jan. 1, 2024
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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
EOP-012-1	Extreme Cold Weather Preparedness and Operations (Requirements 1–2 effective 4/1/28; Requirement 4 effective 10/1/29)	Oct. 1, 2024

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

### Periodic Data Submittals Due in June 2023 - None

### Periodic Data Submittals Due in July 2023

7/20/2023	FAC-003	GO, TO	FAC-003-4 - Transmission Vegetation Management: Q2, 2023 Vegetation Outage Reporting – <b>Align Data Submittal</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.

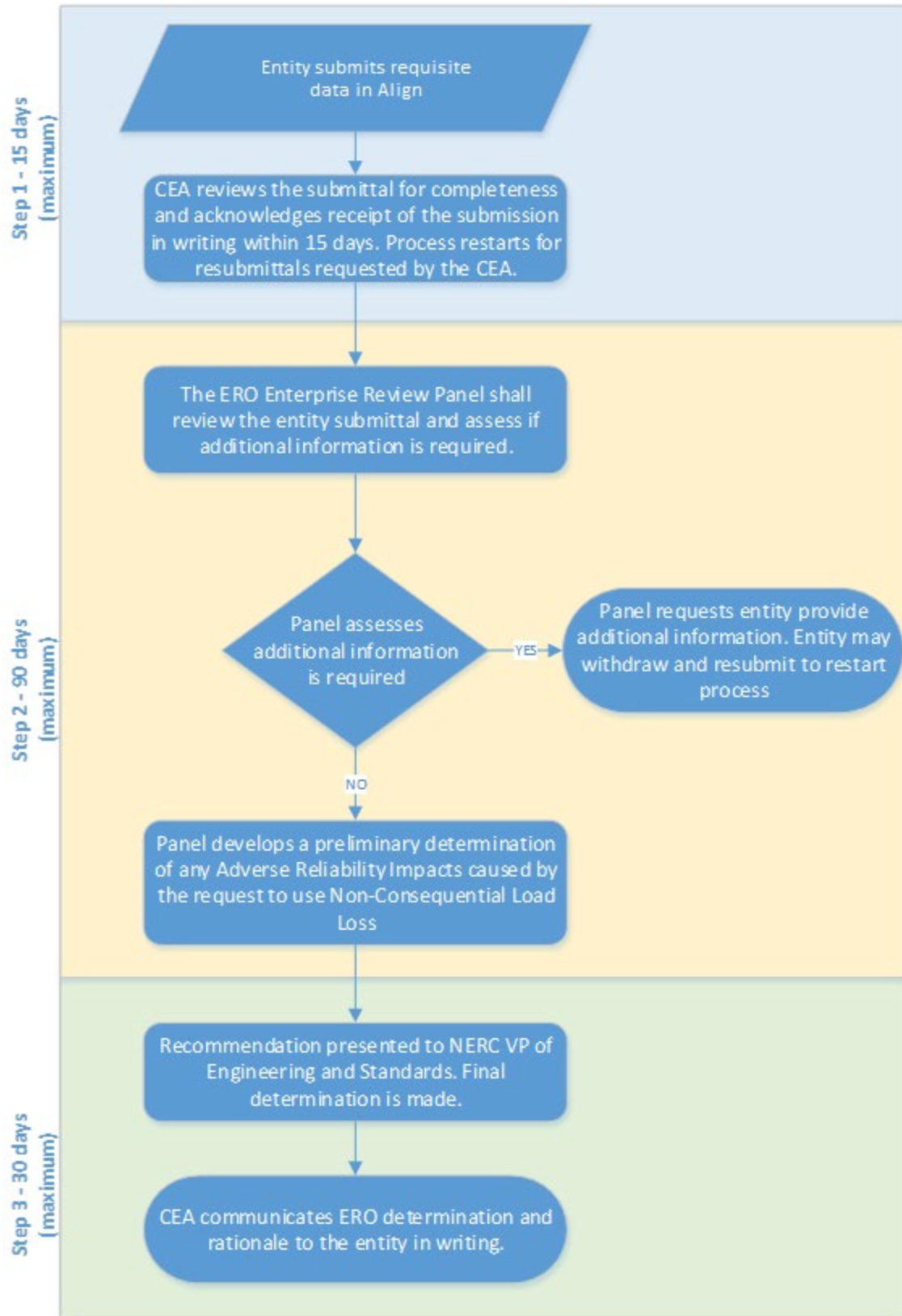
If the review panel determines it will be unable to complete its review within the established timeframe, the review panel, based on consultation with the managers of NERC Compliance Assurance and NERC Power System Analysis, will establish a revised timeline for completing its review. The revised timeline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