

**RELIABILITY FIRST**

Nov. 2, 2022

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



## **Align Update – November**

The pilot period for Release 3.0 (Scheduling and Auditing) has been extended through Q2 2023. This will give the Regions and Entities additional time to pilot the Scheduling and Auditing enhancements which were included in Releases 4.0 and 4.1. At this time, it is expected that full time use of Releases 3.0, 4.0 and 4.1 will begin in Q3 2023.

Performance testing of Align Release 4.5 (Inherent Risk Assessments and Compliance Oversight Plans) has been completed and Release 4.5 is expected to be deployed on Nov. 3, 2022. Even though Release 4.5 will be deployed in early November, the Regions will be utilizing a staggered Pilot and Rollout. The Regions will be piloting the Inherent Risk Assessment functionality in Q1 2023 and the Compliance Oversight Plan functionality in the Q2 2023 timeframe. At this time, it is expected that full time use of Inherent Risk Assessment functionality will begin in Q2 2023 and full-time use of Compliance Oversight Plans will begin in Q3 2023.

The Align User Group (AUG) has completed the prioritization of the Align Backlog/Enhancement list and has identified four major areas of concern (Audit Work Papers, Requests for Information, Coordinated Oversight and Attestations). The AUG had requested that these four areas be focused on next. A number of non-substantive items have also been identified which will require no changes to the data model.

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 that 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! Align Industry Webinar - Secure Evidence Locker (SEL) Data Handling Guidance and Align Oversight**

On Dec. 5, 2022 (1-2 p.m. ET) NERC will be hosting a Secure Evidence Locker (SEL) Data Handling Guidance and Align Oversight Industry Webinar. This webinar will provide stakeholders with the guidance to improve their SEL data management practices and more efficiently manage their data. The webinar will discuss high-level recommendations from NERC's oversight of Align Release 1 activities. A question-and-answer session will follow the presentation.

**Click here to Register:** [Webinar](#)



#### **ACTION REQUIRED – 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 the same in both systems. This process will continue until further notice or until the RF legacy CDMS system is retired.

## NERC Registration News and Updates

### **NEW! Importance of Reporting Changes to Entities Registration Status to RF**

Recently, RF has seen an increase in the number of Registered Entities that are making changes to their Registration status, ownerships or transferred or sold assets without notifying RF Registration prior to the transactions being completed or closed.

RF wants to remind our Registered Entities that it is essential that they follow 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 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@first.org](mailto:compliance@first.org)) of any pending changes to an entity's registration status, assets or ownership prior to the effective dates of the change. RF asks Entities to provide 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.

### **NEW! COMING SOON! ERO Enterprise Onboarding Checklist**

The ERO will soon be announcing a new ERO Enterprise Onboarding Checklist that will provide new Registered Entity Compliance Contacts with a guide to assist them when signing up for essential, ERO Enterprise reliability-focused applications and communications.

The purpose of this checklist is to help new Primary Compliance Contacts (PCCs), Primary Compliance Officers (PCOs), and Alternate Compliance Contacts (ACCs) with signing up for the applications and other communications provided by the ERO Enterprise. This resource is another tool the ERO Enterprise has developed to provide more clarity on registration processes and to improve efficiency for registered entities. To learn more specific details about the initial steps new entities and new

entity contacts must take in the Registration process, please review the [ERO Enterprise 101 Informational Package](#) and the [ERO Enterprise Registration Procedure](#).

### **NEW! NERC Announces the 2023 Compliance Monitoring and Enforcement Program Implementation Plan and ERO Enterprise Periodic Data Submittals Schedule**

The ERO Enterprise has released the [2023 Compliance Monitoring and Enforcement Program Implementation Plan](#), which describes the risks that will be priorities for the ERO Enterprise's CMEP activities in 2023, and the [ERO Enterprise Periodic Data Submittals Schedule](#). Collectively, NERC and each Regional Entity have worked collaboratively throughout this CMEP's development to evaluate reports of NERC committees (especially the Reliability Issues Steering Committee), ERO Enterprise analysis of events and NERC reliability assessments to identify the existing and emerging risks to reliable and secure operations.

### **NEW! ERO Enterprise Publishes Facility Ratings Best Practices Report**

Maintaining reliability across the bulk power system is not an isolated endeavor—it is a complex, multi-pronged effort that is supported by numerous components, programs, initiatives and organizations across North America. Facility ratings play a significant role in the reliable planning and operation of the bulk power system and therefore demand effective management to reduce associated risks and impacts.

The impacts of incorrect facility ratings can range from operating with limited information to uncontrolled widespread service outages and fires. Facility ratings and system limitations also play a key role in modeling the grid as future bulk power system projects are contemplated to manage load growth and mitigate system constraints. To ensure a reliable and secure grid, it is of utmost importance that registered entities have strong and sustainable facility ratings programs.

To support our stakeholders, the ERO Enterprise actively engaged in mitigating activities associated with facility ratings and identified four common themes that pose challenges to the sustainability of accurate facility ratings:

- Lack of awareness
- Inadequate asset and data management
- Inadequate change management
- Inconsistent development and application of facility ratings methodologies

The [ERO Enterprise Themes and Best Practices for Sustaining Accurate Facility Ratings](#) report is intended to aid stakeholders in strengthening the accuracy and sustainability of their facility ratings programs, resulting in the lessening of facility ratings challenges and ensuring a more reliable and secure bulk power system. The best practices in this report are not directives to industry to undertake any actions. Rather, they are best practices for mitigating risks in the area of facility ratings and for addressing the themes identified in this report. [Full Announcement](#)

## **RF plans to retire legacy webCDMS system in January 2023**

RF would like to inform our Registered Entities that RF expects to retire webCDMS at the end of January 2023. Once the system is retired, you will no longer have access to the system to retrieve any historical data you may want to retain. RF recommends that Registered Entities determine any needs for this data now and begin transferring necessary historical data to your own systems for your records as soon as possible. Please do not wait until the last minute to begin this work.

Until then, RF will continue to use webCDMS on a limited basis (to maintain entity contacts, for registration changes and plant winterization surveys, and to close our pre-Align Open Enforcement Actions). If you have any questions pertaining to webCDMS, please contact [Bob Folt](#).

## **Reminder to register for NERC Alerts**

NERC issues NERC alerts to keep registered entities informed about information that impacts the reliability of the BPS. NERC distributes alerts broadly to owners, operators and users of the BPS in North America based on the NERC Compliance Registry ID (NCR ID). Alerts may be targeted to groups of entities based on their registered function(s) (e.g., BAs, Planning Authorities, GOs, etc.). As a result, it is imperative that all registered entities contact NERC via email at [NERC.Alert@nerc.net](mailto:NERC.Alert@nerc.net) to enroll or revise its listing for the NERC alert system, as applicable. Alternatively, an entity may call the NERC Alerts Hotline at 404-446-9797. Instructions describing how to enroll for NERC alerts are also included within the NERC notification letter provided to new registered entities at the time of registration.

Besides signing up for future NERC alerts, previous alerts can be reviewed on the [NERC alerts site](#). Entities should review all previous NERC alerts that apply to their registration function(s). For more information, visit NERC's [About Alerts webpage](#) or review this FAQ. Please note: If a Registered Entity's NERC Alert Contact changes, it is imperative that you also update the NERC Alert contact to ensure that we have the most current and accurate contact information.

## RF announces upcoming changes to Tech Talk call schedule

RF's monthly Technical Talk with RF calls typically take place on the third Monday of each calendar month. However, due to the upcoming holidays, RF will be making adjustments to our Tech Talk schedule as noted below. Please note these changes in your work calendars so you don't miss out on any of our monthly calls! The new dates are:

- Nov. 14, 2022 (1 week early) (Due to holiday)
- Dec. 12, 2022 (1 week early) (Due to holiday)
- Jan. 23, 2023 (1 week later) (Due to holiday)
- Feb. 13, 2023 (1 week early) (Due to holiday)

## Compliance guidance update – NERC Practice Guides

NERC compiles Implementation Guidance and CMEP Practice Guides for specific Standards and Requirements, which can be found [here \(ERO Enterprise - Endorsed Implementation Guidance\)](#).

CMEP Practice Guides address how ERO Enterprise CMEP staff execute compliance monitoring and enforcement activities. Practice Guides are developed and maintained by the ERO Enterprise, although in some cases, may be developed following policy discussions with industry stakeholders. CMEP Practice Guides are posted on the NERC website for transparency.



### Monthly Technical Talk with RF Call



**The next Tech Talk with RF will be held on **Monday, Nov. 14**, 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 the Thanksgiving 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 Michelle Cross, Entity Engagement Manager, via [email](#) or 216-503-0603.

## Event Information

Monday, Nov. 14, 2022

2 p.m. – 3:30 p.m. EST (US & Canada)

<https://reliabilityfirst.webex.com/reliabilityfirst/j.php?MTID=m6b7870c05408ed16b7e234f62152f957>

Meeting Number: 2308 893 1889

Meeting Password: 0123456789

Join by phone: 1-650-479-3207, Access Code: 2308 893 1889

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

## Agenda Topics

### Align Update

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

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

### Reliability Vignettes

Rich Bauer – Associate Principal Engineer, RAPA/Event Analysis, NERC

- NERC has launched Reliability Vignettes, a new product aimed at capturing current operating incidents of interest and projecting the circumstances of the incidents into the future as think pieces for system planning and operating considerations.
- The first vignette is live on NERC's [Event Analysis, Reliability Assessment, and Performance Analysis page](#), where future write-ups will also be posted on an occasional basis as interesting system occurrences are identified.

### Facility Ratings Lessons Learned from Walkdowns

Mallory Carlone – Technical Auditor, Operations & Planning, RF

- Mallory will be reviewing field walkdowns RF conducted throughout 2022. In addition, she will review ReliabilityFirst's FAC-008 and FAC-003 walkdown process which will be a focus for 2023 Audit engagements. Topics will include what to expect, preferred SMEs to have on-site, location selections, time frames, lessons learned, etc. We will also discuss details around RF's



Self Certifications regarding how FAC-008 is being scoped and which entities are being targeted for those types of engagements.

- This presentation is relevant for Transmission Owners, Primary Compliance Contacts and Field Operations: Vegetation, Substation and Subject Matter Experts dealing with Planning, Data and Modeling. Please forward this invite to planning, data and modeling engineers, internal control champions and compliance personnel responsible for FAC-008 and FAC-003.

**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](#), Entity Engagement Manager, 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. (Any questions pertaining to compliance with the NERC Reliability Standards should be directed to RF, not the Help Desk).



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

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

### Periodic Data Submittals Due in November 2022

11/30/2022	PRC-004	GO, TO, DP	Protection System Misoperations - Section 1600 data request for Q3-2022 (July 1 – Sept. 30). <b>Submit in MIDAS portal.</b>
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### Periodic Data Submittals Due in December 2022 - NONE