

**RELIABILITY FIRST**

Oct. 1, 2022

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



## Align Update – October

Please read the [Align Registered Entity Newsletter - July 2022](#). It includes valuable updates on CIP-014-2 FERC Ruling and ERO SEL Impact, Transition to Governance Model, Data Migration and additional Align related resources.

A new Release 4.1, which includes audit enhancements and bug fixes, was rolled out on Sept. 13, 2022.

NERC and the Regions also continue to work on Release 4.5 (Inherent Risk Assessments and Compliance Oversight Plans), Data Migration and prioritizing enhancement activities. Internal and external training materials are currently being worked on for Release 4.5 along with finalizing adoption strategies for the roll-out. Release 4.5 performance testing is also underway. The Release 4.5 functionality is expected to be ready for the production environment in November 2022. Once Release 4.5 is pushed to the production environment, the Regions will pilot the new functionality with a few Entities followed by full adoption in 2023.

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).



### **ACTION REQUIRED – UPDATE COMPLIANCE CONTACT INFORMATION in CORES and webCDMS**

Remember 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 both the 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.

## Transfer of Assets Reporting Guidance

Per Section 501.1.3.5 of the [Rules of Procedure](#), registered entities shall notify their corresponding Regional Entity of any changes that affect the registered entity's responsibilities with respect to Reliability Standards. Changes in ownership or transfer of assets (i.e. sales or acquisition of assets) should be reported to ReliabilityFirst's registration department prior to the sale or transfer. Failure to notify RF will not relieve a registered entity of its responsibility to comply with Reliability Standards or shield it from any penalties or sanctions associated with failing to comply with Reliability Standards applicable to its associated registration.

General guidance regarding the sale or transfer of assets is included in Appendix A of the [ERO Enterprise Registration Procedure](#). Some questions that may be asked include but are not limited to:

- Will the entity name change?
- Will the NCR ID number remain the same?
- Are any other registration changes expected?

The parties will also be asked to update all applicable systems accordingly, which may include but are not limited to:

- Updating the Centralized Organization Registration ERO System (CORES) to reflect:
- The new ultimate Upstream Holding Company
- Updated corporate address
- New contact assignees
- Information about the asset changes within the comment section of CORES
- Revising contact information and permission rights to Align, NERC Alerts, Misoperations Information Data Analysis System (MIDAS), Generation Availability Data System (GADS), Geomagnetic Disturbance Data, etc. (if applicable).

Please contact [Bob Folt](#) if you have any questions regarding registration activities.

## **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.



## GRIDSEC CON 2022

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## GridSecCon Registration is Open

Make Plans to Attend GridSecCon – Oct. 18-19, 2022

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

NERC, the E-ISAC and ReliabilityFirst are co-hosting the 11<sup>th</sup> grid security conference Oct. 18–19, with training opportunities available Oct. 17. Once again, GridSecCon will be held virtually.

At GridSecCon 2022 you can participate in:

- World-class training sessions
- Cutting-edge discussions, breakout sessions and keynotes
- In-depth presentations on emerging cyber and physical threats
- Policy updates, lessons learned and best practices

This year attendees can optimize their GridSecCon experience and choose breakout sessions from six conference tracks: cyber or physical security, supply chain issues, diversity and inclusion, human performance and security policy matters.

For sponsorship inquiries, please contact [events@eisac.com](mailto:events@eisac.com).

## 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:

- Oct. 24, 2022 (1 week later) (Due to GridSecCon 2022)
- 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)



## Monthly Technical Talk with RF Call



**The next Tech Talk with RF will be held on **Monday, Oct. 24**, 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 back one week later** due to GridSecCon (10/17-10/19).

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, **Oct. 24, 2022**

2 p.m. – 3:30 p.m. EST (US & Canada)

<https://reliabilityfirst.webex.com/reliabilityfirst/j.php?MTID=mcf6a3b34585568f96e35217dc4a117db>

Meeting Number: 2304 618 9797

Meeting Password: 0123456789

Join by phone: 1-650-479-3207, Access Code: 2304 618 9797

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

Agenda Topics

## Update on FERC Activities

Kal Ayoub – Deputy Director, Division of Cyber Security

- Kal Ayoub will provide an update on recent reliability related activities including information on the joint federal-state task force on electric transmission, FERC technical conferences, extreme weather actions, notices of proposed rulemaking (NOPRs) and additional reliability orders.
- This presentation is especially relevant for all regulatory experts, plus transmission planners, resiliency experts, winterization engineers, cyber-security experts and those interested in recent FERC dockets.

## Advanced Small Modular Reactors (SMRs)

Andrew Bochman – Senior Grid Strategist, Idaho National Laboratory

- Andrew Bochman will be presenting on small modular reactors, a relatively new technology being tested. While RF is fuel-agnostic, we thought the relevance of this technology would be interesting to our audience including the potential opportunities for transmission planning. During the presentation, Mr. Bochman will cover the Advanced SMR's including how the electrical characteristics are similar to the traditional fossil fuel generation with potentially zero carbon emissions. He will present the benefits, including the potential for coal to SMR conversion at existing sites where coal is being retired and cover current downsides including cost and traditional risks associated with nuclear.

**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.

## NERC Reliability Standards Effective Oct. 1, 2022

- CIP-005-7 Cyber Security — Electronic Security Perimeter(s)
- CIP-010-4 Cyber Security — Configuration Change Management and Vulnerability Assessments
- CIP-013-2 Cyber Security — Supply Chain Risk Management
- PRC-024-3 Frequency and Voltage Protection Settings for Generating Resources

IMPORTANT - If any of the above-mentioned Standard versions are included in an active Coordinated Functional Registration (CFR) agreement, the respective CFR agreement(s) must be revised to include the updated versions of the Standards and Requirements. Any changes or updates to existing CFR agreements and respective division of compliance responsibilities must be made using the NERC CFR tool.

## Compliance Guidance Update – NERC Practice Guides

NERC has posted one new proposed Implementation Guide on the NERC Compliance Guidance web page: **CIP-014-3 R1: Physical Security**.

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.

## 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](http://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](http://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).

### 2023 Upcoming Standards Subject to Future Enforcement

TPL-007-4	Transmission System Planned Performance for Geomagnetic Disturbance (R3, R4,4.1, 4.1.1-4.1.2, 4.2, 4.3, 4.3.1, R8, 8.1, 8.1.1-8.1.2, 8.3, 8.3.1)	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

### 2024 Upcoming Standards Subject to Future Enforcement

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

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

#### Periodic Data Submittals Due in October 2022

10/20/2022	FAC-003-4	GO, TO	FAC-003-4 - Transmission Vegetation Management: Q3, 2022 Vegetation Outage Report – <b>Submit in Align.</b>
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#### 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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