

**RELIABILITY FIRST**

October 4, 2023

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

## **NEW! ERO Enterprise Updates GO/GOP Asset Verification Form**

The ERO Enterprise has announced the implementation of an updated Generator Owner (GO)/Generator Operator (GOP) Asset Verification Form, effective October 2, 2023. The updated form ensures that entities have only one form to complete regarding generator assets during the Registration and Coordinated Oversight data collection process.

As before, completing the form will apply to new GOs and GOPs and currently registered GOs and GOPs, where any one or more of the following activities occur:

- Requesting a new GO and/or GOP registration (New NCR ID)
- Adding/removing generation assets for existing GO and/or GOP registered entities (including one or more of the following):
  - Commissioning new generation assets
  - Buying, transferring, or selling generation assets (ownership changes)
  - Footprint changes
  - Retirement of assets
- Changing entity mapping relationships
- Changing functional capabilities/designations (i.e., Blackstart capability, identification in TOP Restoration Plan, etc.)
- Changing entity name
- Consolidation of GO and/or GOP registrations
- Activating/modifying/deactivating a Coordinated Functional Registration (CFR) or Joint Registered Organizations (JRO)

This form does not need to be completed unless any of the above registration activities occur. If you have any questions about this form, please reach out to Bob Folt, Principal Analyst, RAM/Registration at [bob.folt@rfirst.org](mailto:bob.folt@rfirst.org).

## **NEW! 30-Day Five-Year Review Comment Period (BAL-502-RF-03)**

The RF Planning Resource Adequacy Analysis, Assessment and Documentation (BAL-502-RF-03) Standard will be posted for the required five-year review, 30-Day Comment Period (Oct. 9 - Nov. 7, 2023). Per the RF Reliability Standards Development Procedure, the RF Standards Committee shall ensure that each Standard be reviewed at least once every five years from the effective date of the Standard.

Following the 30-Day Comment Period, the RF Standards Committee will reconvene and develop a recommendation whether the Standards should be reaffirmed, revised, or retired. More information about the five-year review 30-Day Comment Period is forthcoming and will be made available through the ReliabilityFirst website.

## **NEW! NERC to Issue Section 800 Data Request to Assess the Extent of Cross-Border Operation Control of Bulk Power System Elements**

Over the past year, NERC has identified instances of cross-border operation or control of bulk power system elements. Technological advancements, which were previously not available, have enabled dispersed management systems used by distributed energy resource aggregators, Internet-of-Things devices and outage management systems and have increased automation/integration of operational technology networks, increasing the opportunity for cross-border operations.

NERC developed a Section 800 data request (survey) that would enable NERC to identify the extent to which non-U.S. entities have the ability to operate or control U.S. bulk power system assets. Those cross-border operations would include activities stemming from Canada and Mexico, as well as outside of North America.

This data request, which was discussed at the recent Reliability Steering Technical Committee meeting, will allow NERC to assess the extent of risk and begin to evaluate potential next steps. The Section 800 data request is expected to be issued this fall.

## **NEW! Comment Period is Now Open for Proposed Revisions to the NERC Rules of Procedure**

NERC is proposing a series of revisions to Appendix 5B (Compliance Registry Criteria) of the NERC Rules of Procedure (ROP) as well as conforming revisions to Appendices 2 (Definitions) and 5A (Organization Registration and Certification Manual). **The proposed revisions were developed in**

**response to a FERC directive to register owners and operators of inverter-based resources (IBR) that are connected to and have a material impact in the aggregate to the bulk power system (BPS) but are not currently required to register with NERC under the Bulk Electric System (BES) definition.** This posting also includes revisions to the Reserve Sharing Group definition to conform with those being developed in Reliability Standard Project 2022-01 Reporting ACE Definition and Associated Terms (Project 2022-01).

NERC requests comments on the proposed revisions to the NERC ROP. Redlined versions of ROP appendices showing the proposed revisions are available on the NERC website, and detailed summary of the proposed revisions is also available. NERC intends to submit these changes to the NERC Board of Trustees for its consideration in December of 2023.

Please submit any comments to mailto: [ROPcomments@nerc.net](mailto:ROPcomments@nerc.net). Comment period closes 10/30/23.

## **Important NERC Registration Information You Need to Know**

### **Notification of Additional Changes in Status**

Section 501.1.3.5 of NERC's Rules of Procedure requires the **registered entity to notify NERC through its corresponding Regional Entity of any changes in ownership, corporate structure, or similar matters that affect the entity's responsibilities with respect to the Reliability Standards.** Failure to notify NERC through its corresponding Regional Entity will not relieve the registered entity from any responsibility to comply with the Reliability Standards or be liable for any penalties or sanctions associated with failing to comply with such standards. RF requests that Registered Entities provide RF Registration with 30-60 days advance notice of any such changes impacting NERC Registration. Contact Bob Folt, Principal Analyst, RAM and NERC Registration with any questions at [bob.folt@rfirst.org](mailto:bob.folt@rfirst.org).

### **E-ISAC Membership**

As a registered entity, it is important, and expected, that you will join the Electricity Information Sharing and Analysis Center (E-ISAC). E-ISAC membership is available to North American asset owners and operators (AOOs) and select partner organizations, and there is no cost to join. The E-ISAC encourages security individuals with cyber, physical, or operational technology security responsibilities to apply for membership.

Please complete the E-ISAC Membership application here: <https://www.eisac.com/portal>. You may also contact the E-ISAC at [memberservices@eisac.com](mailto:memberservices@eisac.com) with any questions.

## NERC Alert System Registration

NERC's Alert System is the tool used to disseminate information that is critical to ensuring the reliability of the BPS in North America. NERC distributes Alerts broadly to owners, operators, and users of the BPS utilizing the listing of the NCR. Entities registered with NERC are required to provide and maintain up-to-date compliance and cyber security contacts.

As a separate part of the NERC registration process and inclusion on the NCR, please contact NERC via email at [NERC.Alert@nerc.net](mailto:NERC.Alert@nerc.net) to register or revise your listing for the NERC Alert System. Alternately, you may call the NERC Alerts Hotline at 404.446.9797 to speak with someone. Each registered entity identified in the NCR is required to notify NERC Alert 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.

## **UPDATE!** Cybersecurity Training for the Utility Workforce

Starting in late October this year the Department of Energy's Office of Cybersecurity, Energy Security, and Emergency Response (CESER), in partnership with Idaho National Labs (INL) will host a series of six cybersecurity training events for our industry. Each event will be three days designed of training for technical practitioners in electric utilities. All utility employees that have a responsibility for managing grid operations and the digital infrastructure of U.S. based electric utilities, including cooperative, public power, tribal, and investor-owned utilities, are encouraged to attend.

This is a DOE sponsored event, and as such there is no cost to attend. There will be one session in six different locations over the next 6 months, with each session covering the same material. The list of locations and dates follows:

- Columbus, OH – Oct. 31 - Nov 02, 2023
- Orlando, FL – Nov. 28 - 30, 2023
- Kansas City, MO – Dec. 5 - 7, 2023
- San Diego, CA – Jan. 17 - 19, 2024
- Dallas, TX – Jan. 23 - 25, 2024
- Buffalo, NY – Apr. 23 - 25, 2024

The first three events are now open for registration.

See agenda below:

Day 1	Day 2 Morning	Day 2 Afternoon	Day 3
<p><b>DOE CyberStrike (Full Day)</b></p> <p>Participants are guided through hands-on exercises to gain an understanding of the methodology cyber adversaries use to target operational processes for remote attack.</p> <p><b>OR</b></p> <p><b>ICS Foundations (Full Day)</b></p> <p>This course serves the purpose of introducing people into the field of industrial control systems (ICS) / operational technology (OT) and the cybersecurity considerations unique to securing these environments.</p>	<p><b>CHOOSE 1 Morning Session:</b></p> <p><b>CTI in times of conflict</b> Learn about major threat trends observed during the past year and specifically related to the Ukraine/Russia conflict.</p> <p><b>Defending Against State Sponsored Attacks</b> This lab-heavy workshop provides four approaches to foil attackers in a repeatable and verifiable way. Participants will learn how to rapidly harden systems in a low risk, evidence-based approach.</p> <p><b>ICS Security for Leaders and Managers</b> The session empowers leaders and managers responsible for securing critical infrastructure, and operational technology / industrial control system OT/ICS environments.</p> <p><b>OSINT-Practical Open-Source Intelligence Techniques For Defense</b> The talk will cover key OSINT skills that analysts can use to improve their situational awareness and insights and will cover OPSEC considerations, Image Analysis, working with large datasets and Dark Web investigation.</p> <p><b>OR</b></p> <p><b>DOE CyberStrike (Full Day)</b> Participants are guided through hands-on exercises to gain an understanding of the methodology cyber adversaries use to target operational processes for remote attack.</p>	<p><b>CHOOSE 1 Afternoon Session:</b></p> <p><b>CTI in times of conflict</b> Learn about major threat trends observed during the past year and specifically related to the Ukraine/Russia conflict.</p> <p><b>Defending Against State Sponsored Attacks</b> This lab-heavy workshop provides four approaches to foil attackers in a repeatable and verifiable way. Participants will learn how to rapidly harden systems in a low risk, evidence-based approach.</p> <p><b>ICS Security for Leaders and Managers</b> The session empowers leaders and managers responsible for securing critical infrastructure, and operational technology / industrial control system OT/ICS environments.</p> <p><b>OSINT-Practical Open-Source Intelligence Techniques For Defense</b> The talk will cover key OSINT skills that analysts can use to improve their situational awareness and insights and will cover OPSEC considerations, Image Analysis, working with large datasets and Dark Web investigation.</p>	<p><b>Red Team / Blue Team Challenge Competition</b></p> <p>Participants will work through a series of interactive learning scenarios that enable Operational Technology security professionals to develop and master the real-world, in-depth skills they need to defend real-time systems. It is designed as a challenge competition and is split into separate levels so that advanced players may quickly move through earlier levels based on their expertise. The Grid Netwars experience has been themed for the electricity industry and the scenario has been coordinated to align with industry exercise events.</p>



## Monthly Technical Talk with RF Call



The next Tech Talk with RF will be held on **Monday, October 23**, from 2 to 3:30 p.m. EDT.

### October 2023 Technical Talk with RF: Cybersecurity Awareness Month

**Monday, October 23, 2023** 2:00 PM | (UTC-04:00) Eastern Time (US & Canada)

<https://reliabilityfirst.webex.com/reliabilityfirst/j.php?MTID=m72a58b6d4703f5b5c7c9206987ebb241>

Webinar number: 2313 800 1028

Webinar password: 0123456 (0123456 from phones and video systems)

Join by phone: 1-650-479-3207 Call-in toll number (US/Canada)

Access code: 231 380 01028

Please join us on [Slido.com](https://www.slido.com) using #TechTalkRF as the event code

#### Who should attend:

These presentations are especially relevant to compliance personnel and CIP Subject Matter Experts (SMEs) across all NERC registrations, especially those interested in cloud computing and virtualization. We encourage you to forward the webinar link and invitation to anyone interested in learning more about cyber security emerging technologies, risks, and revisions to upcoming standards.

## Agenda Topics

### BES Cyber System (BCS) in the Cloud

Tom Alrich – Independent Consultant and Blogger on cyber security

- Tom will share his thoughts regarding cyber security and CIP compliance in cloud environments. He will be discussing opportunities, risks and mitigations as industry explores the possibility of implemented BES Cyber Systems into the cloud including implications on CIP-002 and additional NERC Standards.

### BES Cyber System Information Access Management

Shon Austin –Principal Technical Auditor, ReliabilityFirst

- Shon will discuss Project 2019-02 BES Cyber System Information Access Management. This initiative enhances BES reliability by creating increased choice, greater flexibility, higher availability, and reduced-cost options for entities to manage their BES Cyber System Information, by providing a secure path towards utilization of modern third-party data storage and analysis systems. In addition, the proposed project would clarify the protections expected when utilizing third-party solutions (e.g., cloud services).

**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.



GRIDSEC CON 2023  
NERC • E-ISAC • NPCC

### **LAST CALL - Sign-up for GridSecCon 2023**

GridSecCon will be held **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](#).

## Align 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.



### **IMPORTANT REMINDER – UPDATE COMPLIANCE CONTACT INFORMATION in CORES**

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



## 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](#).

NERC's training site provides training and materials on a variety of topics for Align and other tools used by NERC, Regional Entity, and registered entity staff. Your Primary Compliance Contact is the



designated Access Approver for Align for your company. Remember to check out NERC's Align project page or reach out to [AskAlign@NERC.net](mailto:AskAlign@NERC.net) for additional information.

## 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, issues, and tickets as promptly as possible during normal business hours.

### 2023 Upcoming Standards Subject to Future Enforcement - NONE

### 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
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-002-3	Disturbance Monitoring and Reporting Requirements   Implementation Plan	April 1, 2024
PRC-023-5	Transmission Relay Loadability   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 October 2023

10/20/2023	FAC-003	GO, TO	FAC-003-4 - Transmission Vegetation Management: Q3, 2023 Vegetation Outage Reporting – <b>Align Data Submittal</b>
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### Periodic Data Submittals Due in November 2023

11/30/2023	PRC-004	GO, TO, DP	Protection System Misoperations - Section 1600 data request for Q3, 2023 (July 1 – Sept. 30). <b>Submit in MIDAS portal.</b>
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