

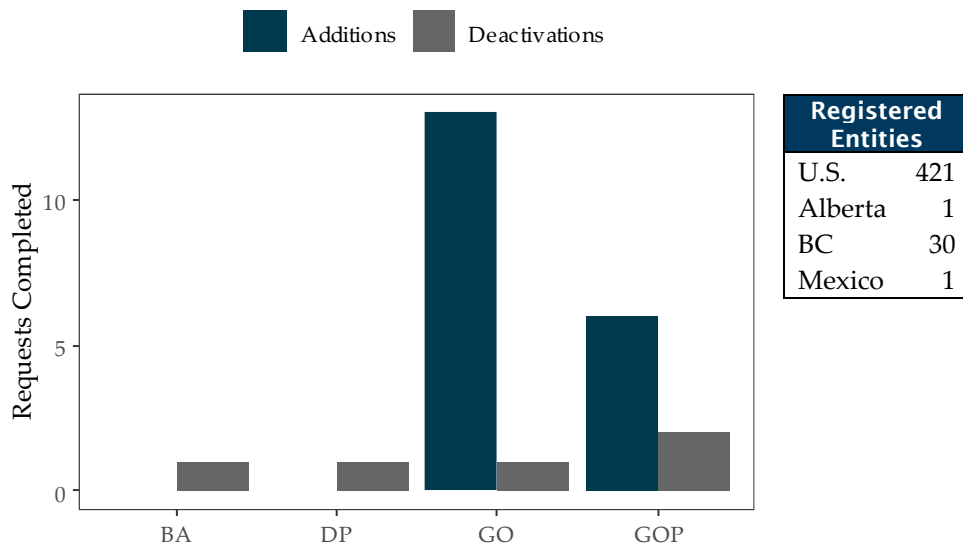
## Oversight Trends Update

Data as of May 1, 2024

This report highlights recent Reliability and Security Oversight data and trends. WECC shares these updates to provide an interconnection-wide context for registered entity compliance programs. Data is preliminary and subject to change in future reports. Contact [oversight@wecc.org](mailto:oversight@wecc.org) with questions.

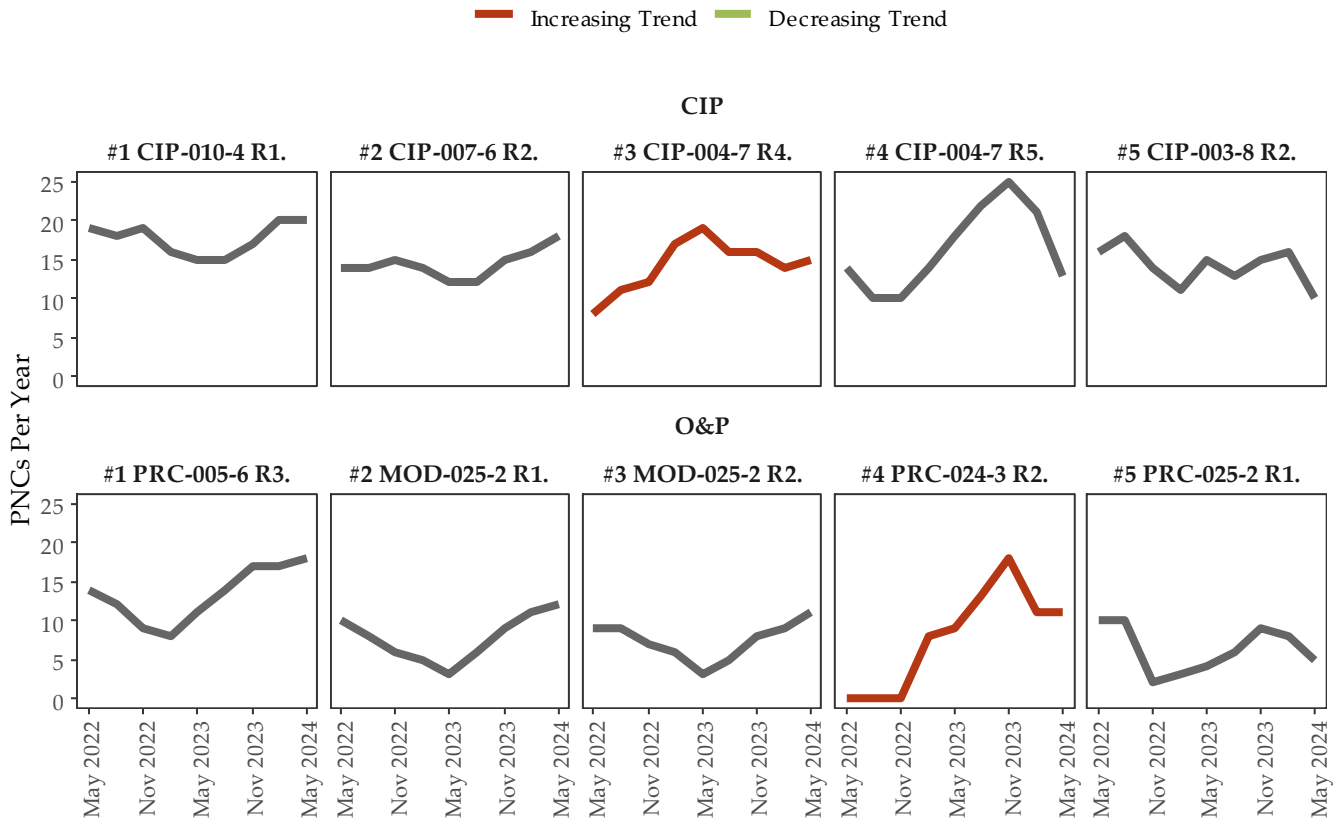
### Registration Changes

WECC analyzes requests to add or deactivate functional responsibility as well as footprint changes and other registration updates. Trends in registration requests reflect the Western Interconnection’s dynamic and evolving risk landscape. The ERO Enterprise is preparing to register owners and operators of additional inverter-based resources (IBR) in accordance with NERC’s work plan.



## Most-Reported Requirements

Many factors drive self-report frequency: the strength of industry preventive and detective internal controls, implementation of new standard versions, and compliance program issues shared by multiple related entities. An increase in frequency does not always indicate a reliability concern but can identify areas of interest for further investigation.



### Legend

- CIP-010-4 R1. Configuration monitoring
- CIP-007-6 R2. Security patch management
- CIP-004-7 R4. Access management program
- CIP-004-7 R5. Access revocation
- CIP-003-8 R2. Cybersecurity plans for low-impact cyber systems
- PRC-005-6 R3. Protection system maintenance intervals
- MOD-025-2 R1. Real power capability verification
- MOD-025-2 R2. Reactive power capability verification
- PRC-024-3 R2. Generator voltage protection settings
- PRC-025-2 R1. Generator relay loadability



## Most-Monitored Requirements

Engagement scopes are based on the CMEP Implementation Plan, Regional Risk Assessment, Inherent Risk Assessment, and Compliance Oversight Plan. Monitoring depth and approach can vary between entities for the same requirement depending on the circumstances, including compliance programs and internal controls.

Requirement	% of Engagements
<b>Audits of BAs, TOPs, and RCs</b>	
1. PRC-027-1 R3.	65%
2. CIP-010-4 R1.	55%
3. CIP-012-1 R1.	45%
4. CIP-008-6 R1.	35%
5. CIP-013-2 R2.	35%
<b>Self-Certifications of BAs, TOPs, and RCs</b>	
1. FAC-003-5 R1.	19%
2. CIP-013-2 R1.	15%
3. CIP-003-8 R1.	12%
4. CIP-004-7 R1.	12%
5. CIP-011-3 R2.	12%
<b>Self-Certifications of GOs and TOs</b>	
1. PRC-005-6 R3.	29%
2. CIP-003-8 R2.	26%
3. FAC-008-5 R6.	24%
4. CIP-003-8 R1.	19%
5. CIP-002-5.1a R1.	18%

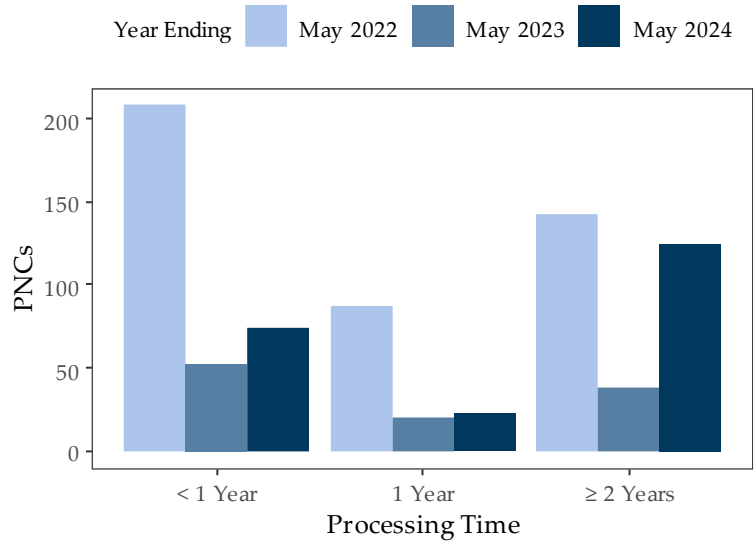
### Reliability Function Abbreviations

Balancing Authority	BA
Generator Owner	GO
Reliability Coordinator	RC
Transmission Operator	TOP
Transmission Owner	TO



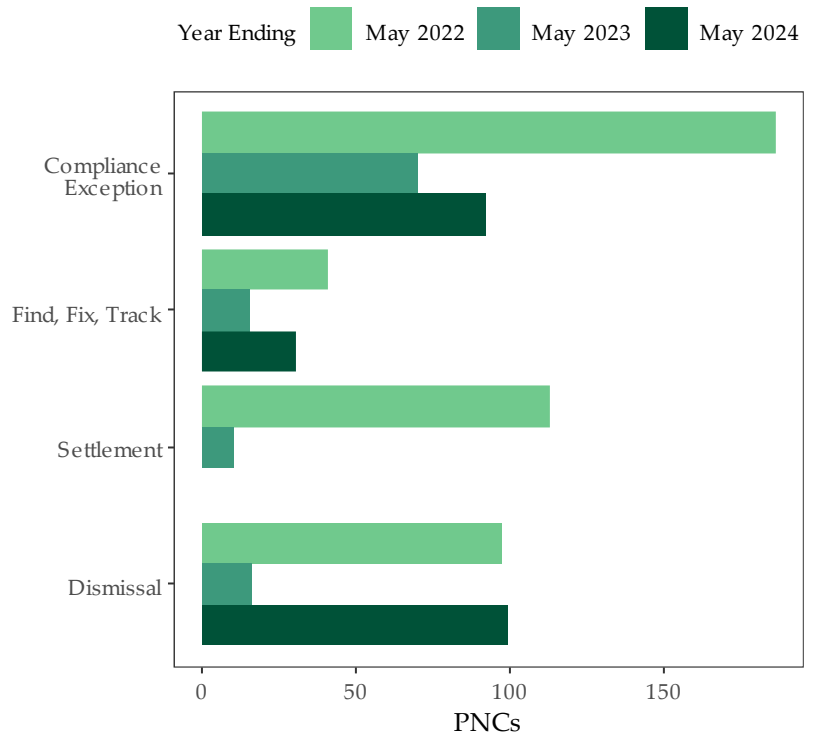
### Violation Processing Time

WECC strives to process enforcement cases in a timely manner. Processing time varies based on factors including complexity of the noncompliance, mitigation timeline, entity response, inventory size, and case prioritization.



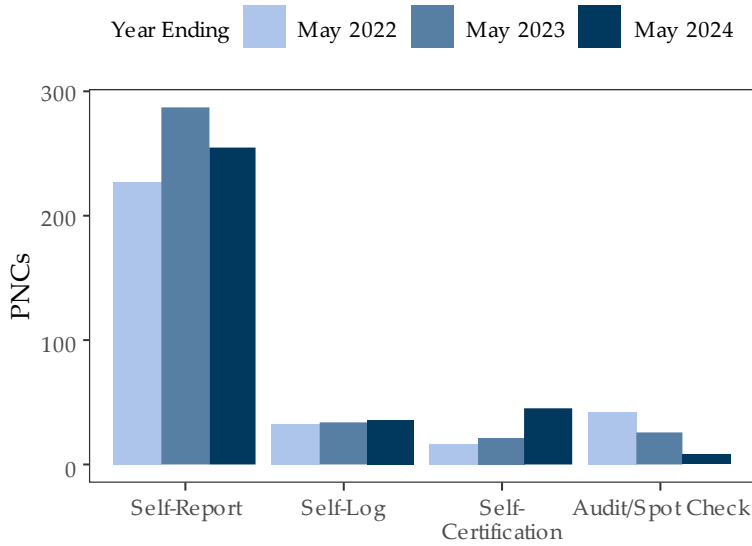
### Disposition Methods

The appropriate disposition method for a case is based on risk and complexity of the issue, mitigation, entity compliance history, and regulatory guidance.



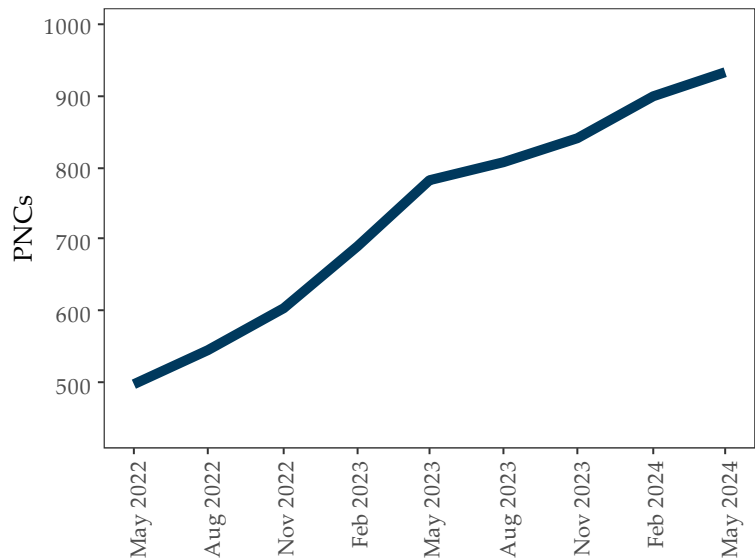
## Discovery Methods

Most noncompliance comes through discovery methods within the entity — primarily self-reports, as well as self-logs and self-certification. WECC is working with entities to strengthen and expand the self-logging program, which reflects strong entity compliance programs and internal controls.



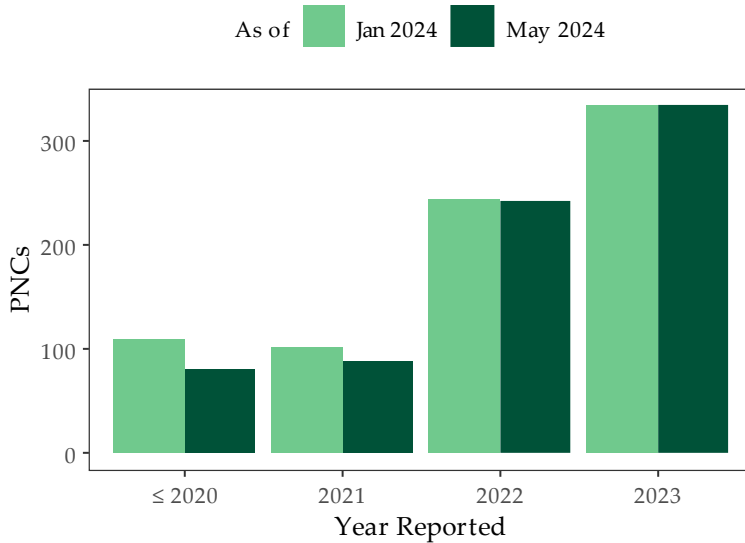
## Enforcement Inventory Size

The enforcement inventory consists of PNCs received by WECC and not yet processed by providing the disposition to the entity. Inventory size affects processing times, risk responsiveness, outreach, and resource management.



### Inventory Age

The ERO Enterprise continues to focus on reducing the volume of the oldest open inventory. WECC is prioritizing cases received before 2022 for enforcement and mitigation processing.



### Mitigation Status

Mitigation includes remediation and prevention of recurrence. Entities must—

1. Prepare mitigation,
2. Submit for approval by WECC,
3. Implement mitigation, and
4. Notify WECC of completion.

WECC verifies mitigation completion depending on risk, disposition method, compliance history, and other factors.

As of May 2022 (light blue), May 2023 (medium blue), and May 2024 (dark blue)

