



# Reliability & Security Oversight Monthly Update

June 20, 2024

Mailee Cook, Training and Outreach Specialist

# WECC Website SURVEY









# SYSTEMS SEGURITY CONFERENCE





# **Antitrust Policy**

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- All participants must comply with the policy and guidelines
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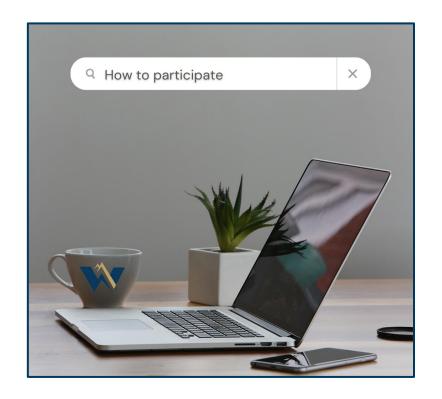


# **Antitrust Policy**

- This webinar is being recorded and will be posted publicly
- By participating, you give your consent for your name, voice, image, and likeness to be included in that recording
- WECC strives to ensure the information presented today is accurate and reflects the views of WECC
- However, all interpretations and positions are subject to change
- If you have any questions, please contact WECC's legal counsel



# **Participating**



Send questions via chat to WECC Meetings
Use the "raise hand" feature



# **Agenda**

- R&SO Standards Update
  - Steve Rueckert, Director of Standards, WECC
- Registration Application Expectations
  - Abby Fellinger, Senior Registration & Certification Engineer, O&P, WECC
- Certification Process
  - Carmelina Spina, Senior Registration & Certification Engineer, O&P, WECC
- Inverter-based Resources Initiative Update
  - Mark Rogers, Senior Technical Advisor, Registration & Certification, WECC





### R&SO Standards Update

June 20, 2024

Steve Rueckert

Director of Standards

# **Items Covered**

- Current WECC Activities
- Current NERC Activities



# **Current WECC Projects**

- WECC-0142 Retire BAL-002-WECC
  - Kevin Conway added to Drafting Team
  - Tall hurdle
- WECC-0153 Interchange Consolidation Criterion
  - Consolidation of 11 WECC INT Criteria into a single document
  - Approved by the Ballot Pool (100%)
  - Approved by the Board
    - o Becomes effective October 1, 2024
- WECC-0155 PRC-006-WECC-CRT-4 Five-year Review
  - WSC accepted the SAR
  - DT being formed



# **NERC Activities**

- NERC has 24 active or new projects
- Prioritized as high, medium, or low
  - Projects with FERC mandated completion dates or NERC BOT directed dates are prioritized as high
- Low and medium projects may not be addressed until 2025 or 2026
- See prioritization on the NERC Standards Under Development page at <a href="https://www.nerc.com/pa/Stand/Pages/Standards-Under-Development.aspx">https://www.nerc.com/pa/Stand/Pages/Standards-Under-Development.aspx</a>



# **Recent NERC Ballots**

- Project 2021-03 CIP-002-Y
  - Received a weighted 47.72% approval
    - WECC voted negative with comments (All regions submitting a vote voted NO)
  - DT will review comments
- Project 2023-07 Transmission Planning Performance Requirements for Extreme Weather TPL-008
  - Only received an 18.69% approval
  - WECC voted negative with comments



## **NERC Events**

- NERC SC meeting held on June 12, 2024
  - Four Action Items
    - Three approved as proposed
    - One SAR rejected (Agenda Item 4)
  - Agenda packet available at: <a href="https://www.nerc.com/comm/SC/Agenda%20Highlights%20and%20Minutes/SC\_Meeting-Agenda March 20 2024.pdf">https://www.nerc.com/comm/SC/Agenda%20Highlights%20and%20Minutes/SC\_Meeting-Agenda March 20 2024.pdf</a>
- Project 2022-03 Energy Assurance with Energy-constrained Resources
  - Comment and Ballot close June 20, 2024
- Project 2023-06 Risk Assessment Refinement
  - Comment and Ballot close July 3, 2024



### **NERC Events**

- Project 2023-02 Analysis and mitigation of BES Inverter-Based Resource Performance Issues
  - Comment and Ballot close July 10, 2024
- Four SARs posted for comment
  - Comment periods close between June 24, and July 1, 2024
- Project 2023-04 Modifications to CIP-003
  - Comment and Ballot close July 11, 2024



## **NERC Events**

- All NERC Projects
  - Please submit comments
  - Please vote
- Your voice and opinion matter
  - Helps the drafting teams develop better products





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# Registration Application Expectations

June 20, 2024

Abby Fellinger

Senior Registration &

Certification Engineer, O&P

# **Focused Registration Activities**

- New Entity Registration Requests
- Adding Assets to Existing Registration
  - Footprint Change Addition
- When to Contact WECC Registration
  - registration@wecc.org
- International Registration/Changes
- Resources





# Organization Registration Requirements

- Identifies and registers BPS users, owners, and operators who are responsible for performing specified reliability functions to which requirements of mandatory NERC Reliability Standards apply.
  - Registered entities can face penalties or sanctions for noncompliance

- Requirements and activities for the Organization Registration Program are embodied in the FERC-approved <u>NERC</u> <u>Rules of Procedure</u> (ROP):
  - o ROP, Section 500 | Organization Registration and Certification
  - Appendix 2 | Definitions Used in the ROP
  - Appendix 5A | Organization Registration and Certification Manual
  - Appendix 5B | Statement of Compliance Criteria
  - Appendix 5C | Procedure for Requesting and Receiving an Exception from the Application of the NERC Definition of BES



# **Inclusions and Exclusions Listed in Appendix 2**

#### **Inclusions and Exclusions**

Example diagrams of BES inclusions and exclusions are available in:

**BES Definition Reference Document** 

CMEP Practice Guide: Application of the BES Definition to Battery Energy Storage Systems and Hybrid Resources

Processes exist for submittal and consideration of Exceptions and Materiality:

• Review Appendix 5A, Appendix 5B, and Appendix 5C

#### **Majority of Applications: Inclusion 4**





# **New Entity Registration Requests**

### Complete Self-evaluation

- Evaluate applicability of the BES Definition, Appendix 2, and Appendix 5B registration criteria
- Determine whether Organization Certification Process applies (BA, TOP, RC functions)

### Contact WECC with Registration Questions

- WECC may advise on applicability of registration criteria and answer process questions
- Email questions to <u>registration@wecc.org</u>

### Submit a Registration Request Through CORES

- How to Submit a New Registration Request in CORES | CORES End User Guide
- Add project details and relevant documents in the Comments and Attachments section in CORES

### Respond to WECC Requests for Information

WECC reviews the request and will ask for additional information as needed



# Information Collected: GO/GOP Registration

### **CORES** Required Fields

- Registered Entity Name
- Address
- Affiliates and Holding Companies
- Contact Roles
- Entity Scopes (Registered Functions)
- Functional Mapping
- Comments and Attachments:
  - **Comment**: Describe facility project and phase(s)
  - Attachment: Zip folder of documentation referenced on this slide

### Registration Documentation Required

- Registration Request Form/Questionnaire
- Map/geographic location of facility
- GO GOP Asset Verification Form
- Interconnection Agreements
- Third-Party or Operating Agreements
- Operating One-line Diagrams
  - Depicting the Generation Resource(s) through to the Point of Interconnection w/Transmission Owner (TO)
- Nameplate Data for the individual PV inverters

**Note:** Provided documentation should include accurate facility profile information (such as gross nameplate rating, capacity in-service agreement limitations, and inverter information).



# **Example of Registration Request Form Information**

#### **Facility Information**

#### New Registration Information | Interconnection Details from Appendix C\*

Entity Facility Name is a fuel type generation facility that is Jocated in Name County, State which consists of ## inverters (rated at #.# MVA each), has a gross nameplate rating of ### MVA. This facility has a requested capacity in-service agreement of XXX MW at the Point of Interconnection. The Fuel Type facility is connected to the Name XXXXV Switchyard via a XXX ft generation tie line.

#### **Facility Information for New Registration**

- Tentative Registration Effective Date | Commercial Operation Date (COD):
- Physical Address:
  - Latitude and Longitude:
- Point of Interconnection:
- Interconnection Voltage:
- Fuel Type:
- Individual Inverter Rating (MVA):
- Inverter Type:
- Gross Nameplate Rating (MVA and MW):
- Nameplate Rating Limitation at POI | Operational Rating (MVA and MW):

	Phase 1	Phase 2	Total
Total rated (gross) capacity at generator/inverter terminals:			
Total rated (gross) capacity at GSU transformer			
Total net capacity provided under the LGIA at Point of			
Interconnection:			

#### Readiness Questions

#### Facility Ratings

 Describe your change control process to ensure Facility Ratings are updated for both emergency and planned changes in the field.
 Applicable to GO

Click or tap here to enter text.

(2) What neighboring entities (tie-lines) do you coordinate with to establish Facility Ratings. Please describe your process to do so.

Applicable to GO

Click or tap here to enter text.

#### Protection Systems

(1) Describe how you track required maintenance activities for Protection System Components. Do you have an integrated inventory and workorder system? Applicable to GO

Click or tap here to enter text.

(2) Do you have a protection system coordination process or checklist that integrates requirements from other NERC compliance standards, including PRC-019, PRC-024, and PRC-025? Applicable to GO

Click or tap here to enter text.

(3) What electrically joined Facilities does your entity coordinate protection system settings with? Describe the process(es). Applicable to GO

applicable to GO

Click or tap here to enter text

#### Remote Access

(1) Do you allow remote access to your BES Cyber Systems? Applicable to GO, GOP

Click or tap here to enter text.

(2) If yes, does this include vendors? Applicable to GO, GOP

Click or tap here to enter text.

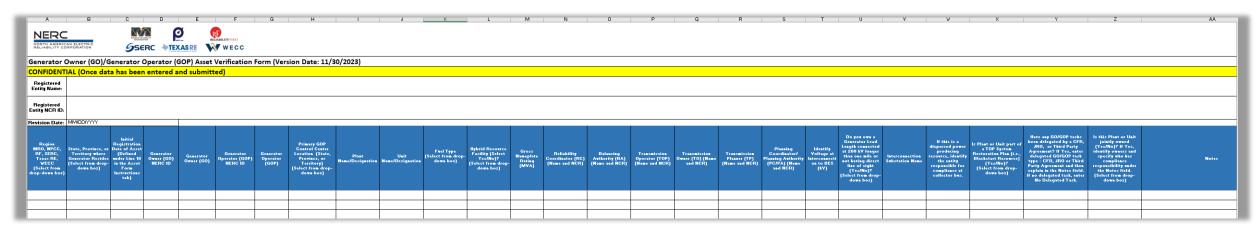
(3) If yes to either, what security steps have you taken to protect your entity (including low-impact systems) from cyber-attack through remote access? Applicable to GO, GOP

\*Explain if there are any discrepancies between documentation provided (such as Interconnection Agreement and One-line Diagram information).



## **GO GOP Asset Verification Form**

ERO Enterprise GO GOP Asset Verification Form



#### **Basic Registration Data**

- GO/GOP/NCR ID
- Plant/Unit Type/Size
- Connection Voltage/Location
- Generator Lead Line

#### **Relationships**

- Functional Relationships
- Responsibilities
- JRO/CFR
- Ownership

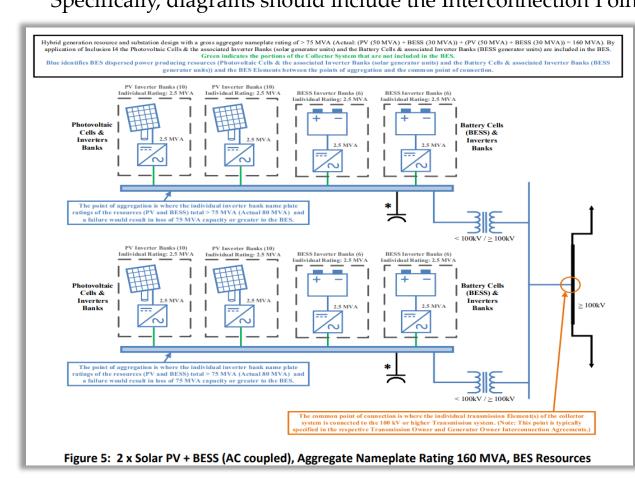
#### **Notes**

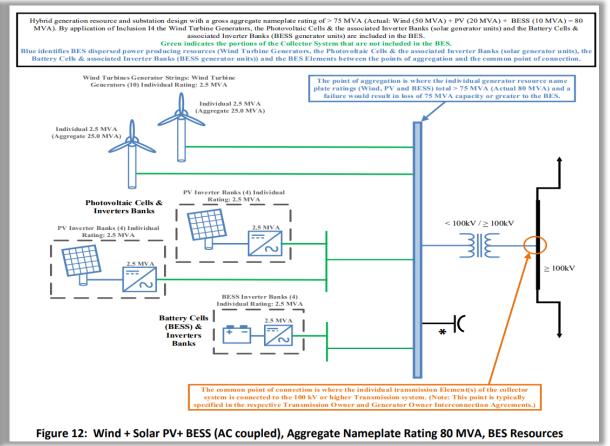
- Examples of information to explain:
  - Multiple fuel types
  - Limitations of nameplate rating
  - Describe agreements in place



# **Operating One-line Diagrams**

One-line Diagrams should depict the Generation Resource(s) through to the Point of Interconnection w/TO. Specifically, diagrams should include the Interconnection Point and Collector System with feeders and individual ratings.

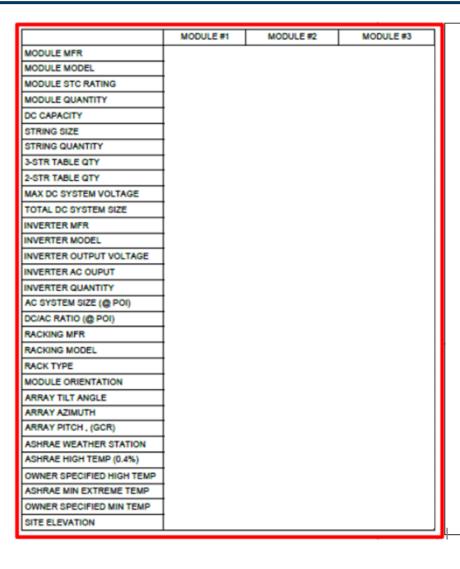






Application of the BES Definition to BESS and Hybrid Resources

## **Operating One-line Diagrams—Inverter Nameplate**



Redacted Site Map
with Individual
Inverters



### Manufacturer's Data Specifications—Solar/BESS Inverters

#### **Example of Datasheet Information**



Type designation	SG3425UD-MV	SG3600UD-MV	
Input (DC)			
Max. PV input voltage	1500 V		
Min. PV input voltage / Start-up input voltage	875 V / 915 V	915 V / 955 V	
Available DC fuse sizes	250 A - 630 A		
MPP Voltage Range	875 V - 1500 V	915 V - 1500 V	
Full power MPP voltage range @ 45 °C	875 V - 1300 V *	915 V - 1300 V *	
No. of DC inputs	24 ( optional: 28 )		
Max. DC short-circuit current	10000 A		
PV array configuration	Negative grounding or floating		
Output (AC)			
AC output power	3425 kVA @ 45 °C(113 °F),	3600 kVA @ 45°C( 113 °F ),	
	3083 kVA @ 50 °C(122 °F) **	3240 kVA @ 50°C(122 °F) *	
Max. AC output current	165 A	173 A	
AC voltage	12 kV - 34.5 kV		
Nominal grid frequency / Grid frequency range	60 Hz / 57 Hz – 63 Hz		
THD	< 3 % ( at nominal power )		
Power factor at nominal power / Ajustable power factor	> 0.99 / 0.8 leading - 0.8 lagging		
Efficiency			
Inverter max. efficiency	98.9 %		
Inverter CEC efficiency	98.5 %		
Transformer			
Transformer rated power	3425 kVA	3600 kVA	
Transformer max. power	3425 kVA 3600 kVA		
LV / MV voltage	0.6 kV / (12 – 35 ) kV 0.63 kV / (12 – 35 ) kV		
Transformer vector	Dyl ( Optional: Dyll, Yny0 )		
Transformer cooling type	KNAN ( Optional: ONAN )		

Protection			
DC input protection	Load switch + fuse		
Inverter output protection	Circuit breaker		
AC MV output protection	Load switch + fuse		
Overvoltage protection	DC Type II / AC Type II		
Grid monitoring / Ground fault monitoring	Yes / Yes		
Insulation monitoring	Yes		
Overheat protection	Yes		
General data			
Dimensions (W*H*D)	6058 mm * 2896 mm * 2438 mm 238.5" * 114.0" * 96.0"		
Weight	18000 kg 39683.2 lbs		
Degree of protection	NEMA 4X ( Electronic for Inverter ) /NEMA 3R ( Others )		
Auxiliary power supply	5 kVA, 120 Vac; Optional: 30 KVA 480 Vac + 5 KVA 120 Vac		
Operating ambient temperature range(it refers to the	-35 °C to 60 °C ( > 45 °C derating ) / optional: -40 °C to 60 °C ( > 45 °C derating		
ambient temperature of 1m around the inverter.)	-31 °F to 140 °F ( > 113 °F derating ) / optional: -40 °F to 140 °F ( > 113 °F derating		
Allowable relative humidity range	0 % - 100 %		
Cooling method	Temperature controlled forced air cooling		
Max. operating altitude	1000 m ( Standard ) / > 1000 m ( Customized )		
Max. Operating attitude	( 3280.8 ft ( standard ) / > 3280.8 ft ( Customized ) )		
DC-Coupled storage interface	Optional		
Night reactive power function	Optional		
Charging power from the grid	Optional		
Communication	Standard: RS485, Ethernet		
Compliance	UL 1741, IEEE 1547, UL 1741 SA, NEC 2017, CSA C22.2 No.107.1-01		
Grid support	Q at night function (optional), L/HVRT, L/HFRT, Active & reactive power control		
	and power ramp rate control, Volt-var, Frequency-watt		

<sup>\*</sup> Full power MPP range is temperature dependent, check the characteristic curve of the inverter for more information

SG3425UD-MV SG3600UD-MV Datasheet V17 SUNGROW



<sup>\*\*</sup> For sustained operation above 40°C, an optional 60 °C temperature rise transformer is recommended

# Adding Assets to Existing Registration

- Footprint Change Process
  - Sign in to ERO Portal
  - Access CORES for your entity
  - Click on "Comments and Attachments" to add a description of change
  - Send an email to registration@wecc.org
  - Respond to information requests

### Example of Footprint Change in CORES

Please accept this as notification of Registered Entity Name's request add the Name facility to its registration under NCR##### as a GO/GOP with a tentative effective registration date of MM/DD/YYYY. The facility has a gross nameplate rating of XXX.X MVA and is connected to the grid at ### kV in the WECC Region.

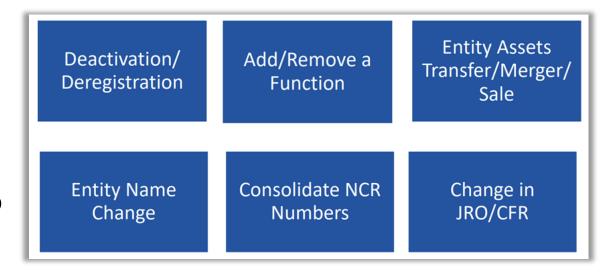
Entity Name is submitting the following documents pertaining to facility name for WECC's review:

- Generator Registration Questionnaire
- ERO Enterprise GO GOP Asset Verification Form
- As-built one-line diagram(s)
- Interconnection Agreement(s)
- O&M Agreement



# Timeline of Reporting Registration Changes

- Please submit registration activity requests 60 days ahead of the expected effective date of change.
- The request should be sent to registration@wecc.org.
- If the planned effective date changes, please email an update to registration@wecc.org.



 Please notify WECC when the registration activity is complete (when the effective date is reached).



# International Registration/Changes

- All new international registrations should be submitted via
   WECC's <u>international registration form</u>
- All requests to change a functional registration must use the <u>international registration form</u>
  - Example: an entity that believes it no longer meets the criteria of a
     Distribution Provider (DP) must first complete the registration form and
     send it to <a href="mailto:registration@wecc.org">registration@wecc.org</a> to start the evaluation process by WECC
- WECC registration will then notify the WECC International Relations Manager of the request



# Resources

### WECC Registration Page

• WECC Entity-Registration

### NERC Registration Page

• NERC Organization Registration

### Onboarding Information

ERO Enterprise 101 Informational Package

**ERO Enterprise Entity Onboarding Checklist** 

WECC Generator Welcome Package





### **Certification Process**

June 20, 2024

Carmelina Spina

Senior Registration & Certification Engineer, O&P

# **Objectives**

- 1. Certification Applicability
- 2. Types of Certifications
- 3. Initiating Certifications Activities
- 4. Full Certification process
- 5. Certification Review process
- 6. Notification
- 7. Resources



# **Certification Applicability**

- Who does a Certification apply to?
  - Existing BA, RC, or TOP
  - New BA, RC, or TOP
- Why must these entities go through Certification?
  - To assess the processes, procedures, tools, personnel, and training entities used to perform their respective function
  - Attain a reasonable level of assurance that the entity has the capacity to meet the compliance obligations of its registration



# **Types of Certifications**

#### **Full Certifications**

Prospective entity looking to become a NERC registered BA, TOP, or RC

#### **Certification reviews**

- Already registered entity (RC, TOP, and BA)
- Changes to the registered entity's footprint (CFR assignments as well), relocation of a control center, or modification of an energy management system (EMS)

#### **Lesser Activities**

Discretion of Regional Entity and NERC



## **Initiation of Certification Activities**

## When to notify WECC

At least 12 months out from expected certification completion

### **How to notify WECC**

- WECC.org -> registration and certification -> organization certification
- Fill out the "ERO Certification Application"

## Who to notify at WECC

- Send notification of application to certification@wecc.org
- Send application through WECC's secure workspace



## **Full Certification Process**

#### Before on-site visit

- Entity submits application to WECC
- WECC assigns CTL
- Kick-off call set with WECC Certification Team
- CTL sends Certification package to entity (w/ scope), schedule onsite visit (90 days before onsite)
- WECC team reviews documentation

#### On-site visit

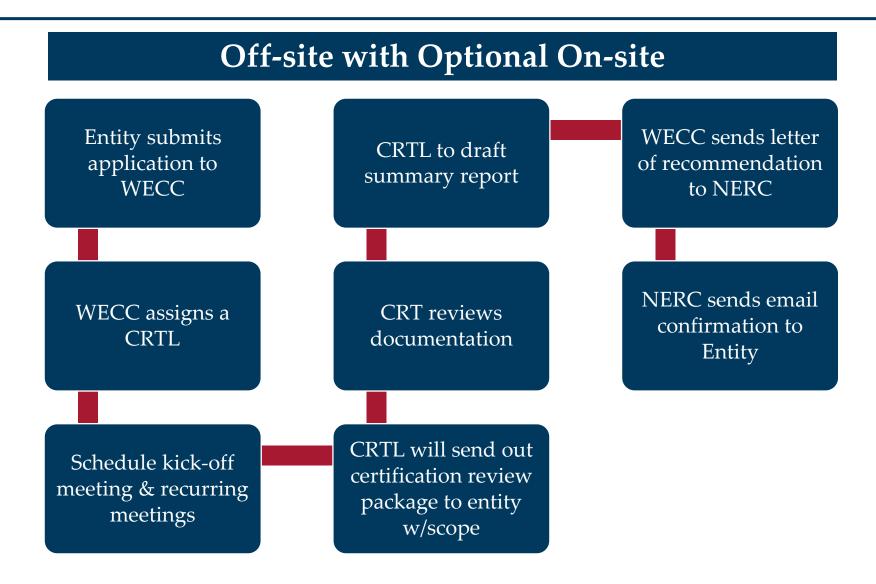
- Primary and backup control center
- Opening presentation
- Review items only available on site
- Conduct interviews
- Daily debriefs
- Closing presentation
- Entity feedback form

#### After on-site visit

- Review documentation provided by the entity
- Certification draft and final reports
- WECC sends letter of recommendation
- NERC sends official notification and certificate to entity
- Entity must commence operations within 12 months of certification



## **Certification Review Process**





## **Notification**

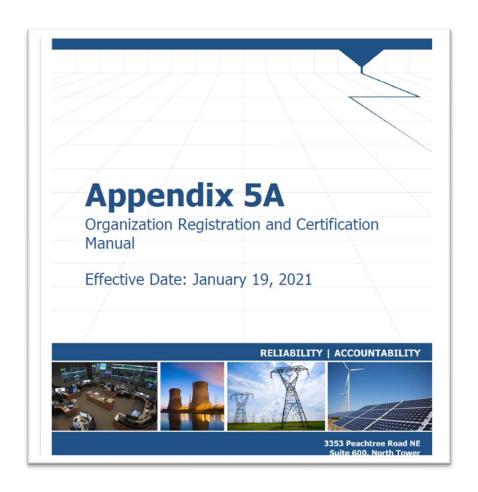
What if an entity fails to notify WECC of changes applicable to a Certification review or Full Certification?

- Compliance oversight team will be notified
- Will be included in the entity's compliance oversight plan
- May affect future audit scopes or entity engagements
- WECC may conduct a spot-check



## Resources

- WECC's Organization Certification Page
  - Certification Application
  - Email: Certification@wecc.org
  - NERC's Organization Certification Page
    - Final Certification Reports
    - Certification Process documents







# IBR Registration Initiative Update

June 20, 2024

Abby Fellinger

Senior Registration &

Certification Engineer, O&P

## **IBR Registration Initiative Update**

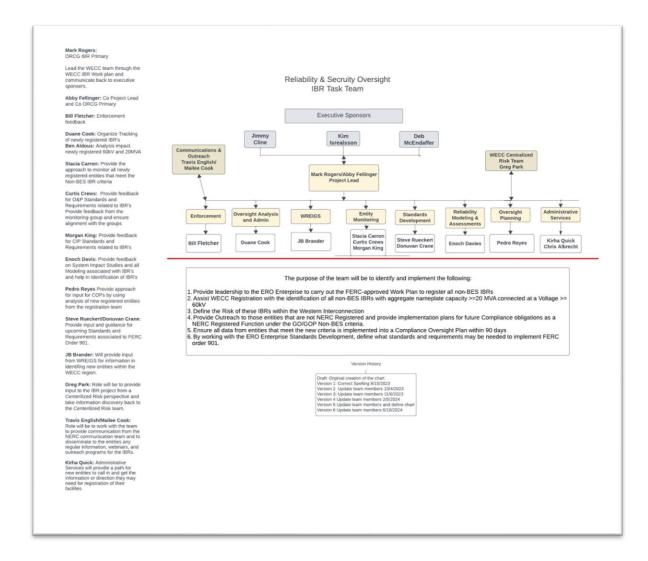
- NERC Rules of Procedure Changes (<u>proposed revisions</u>)
  - Anticipated FERC approval: June 27, 2024
- ERO Enterprise efforts
  - Preparing training for the new entities
  - Outreach with road shows across the regions





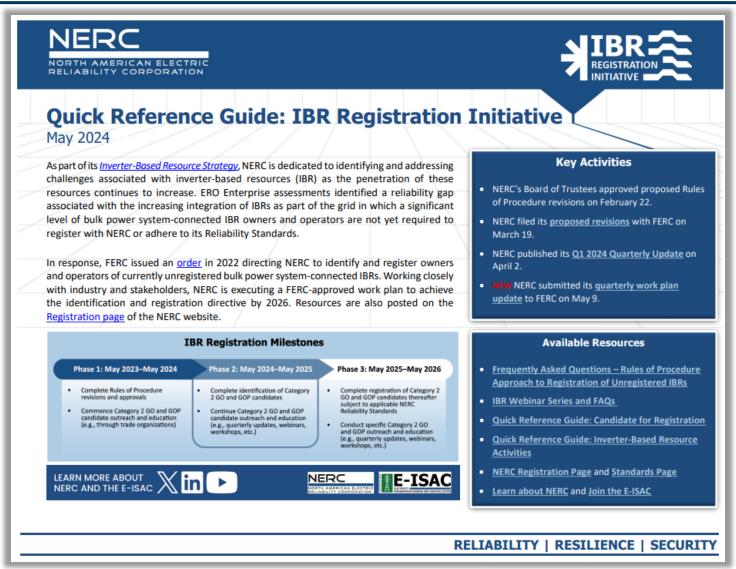
## **WECC Registration Team Efforts**

- WECC Registration team
  - Analyzing the numbers for the new entity data
  - Working with subgroups from the WECC IBR Task Team



## **Communications Efforts**

- Current Communications Products:
  - Strategic Communications
     Plan
  - Quick Reference Guides
  - FAQs
  - Fact Sheets
  - Quarterly Updates
  - WECC IBR website posts







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