



RELIABILITY & SECURITY

Oversight Monthly Update

October 17, 2024, 2:00 p.m. MT

Antitrust Policy

- All WECC meetings are conducted in accordance with the WECC Antitrust Policy and the NERC Antitrust Compliance Guidelines
- All participants must comply with the policy and guidelines
- This meeting is public—confidential or proprietary information should not be discussed in open session

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



Reliability & Security Oversight Monthly Update

October 17, 2024

Mailee Cook
Training and Outreach
Specialist



RELIABILITY IN THE WEST

A DISCUSSION SERIES





Enforcement ***FUNDAMENTALS***

RELIABILITY & SECURITY

Workshop - Portland, Oregon

October 29–30, 2024





Grid *FUNDAMENTALS*

November 5-6, 2024



Compliance *FUNDAMENTALS*



November 14, 2024, 9:00 a.m. to noon MT



Project 2024-03 Update

October 17, 2024

Curtis Crews
Sr. Technical Advisor



IBR Registration Initiative Update

October 17, 2024

Abby Fellingner, Sr. Registration &
Certification Engineer, O&P

Mark Rogers, Sr. Technical Advisor,
Registration & Certification

ERO Next Steps

- ERO IBR Registration Webinar
 - November 13, 2024, 3:00 – 5:00 p.m. EST
 - Introduction to NERC and E-ISAC
 - IBR Initiative Milestones / Workplan
 - Status and Results of ERO RFI to the BAs and TOs
 - Standards and order 901 Milestones and updates
 - Compliance and Enforcement Expectations
 - Communications Resources

ERO Next Steps

- Regional Registration Panel
 - Introductions of regional staff
 - Discuss basic regional process
 - Discuss new entity engagement through RFI and asset verification form
 - What entity information will be expected
- Next webinar February 2025 (*tentative*)



WECC Request for Information
Entities with Category 2 Inverter-Based Resources connected to the Bulk Power System
February 20, 2024

The Primary Compliance Contact
Organization Registration identifies and registers bulk power system (BPS) owners, operators and users who are responsible for performing specified reliability functions to which requirements of mandatory NERC Reliability Standards are applicable. Requirements and activities for the Organization Registration Program are embodied in Section 500 (Organization Registration and Certification) and Appendices 5A and 5B of the FERC-approved NERC Rules of Procedure (ROP).

Background
On November 17, 2023, the Federal Energy Regulatory Commission (FERC) directed NERC to submit a work plan describing how it plans to identify and register owners and operators of inverter-based resources (IBR) that are connected to and have a material impact in the aggregate on the Bulk Power System (BPS), but are not currently required to register with NERC under the bulk electric system (BES) definition. On February 15, 2024, as amended in March 2023, NERC filed a Work Plan outlining concepts and milestones to achieve that directive, including issuing a Request for Information (RFI) to functional entities with unregistered IBRs in their footprints. On May 16, 2023, FERC accepted the Work Plan.

On March 15, 2024, NERC filed with FERC a proposed revision to its Registry Criteria to include owners and operators of non-BES IBRs interconnected to the BPS and have a material aggregate impact on BES reliability. To address the impact on reliability, the revised Generator Owner (GO) and Generator Operator (GPO) Registry Criteria would include owners and operators of non-BES IBRs that either have or contribute to an aggregate nameplate capacity of greater than or equal to 20 MW, connected through a system designed primarily for delivering such capacity to a common point of connection at a voltage greater than or equal to 80 kV (i.e., Category 2 GO and Category 2 GPO). On June 27, 2024, FERC issued an order approving the Rules of Procedure revisions¹.

Request for Information – Material Information of Category 2 Assets
As part of an ERO-wide effort to determine assets under the new Category 2 criteria, your respective regional entity needs to validate the information identified by the Transmission Owner (TO), Balancing Authority, or the Energy Information Administration (EIA).² The data indicator **Entity Name** (**Category Name**) is associated with its own Category 2 asset(s), as shown in Table 1. Please certify that the Category 2 information shown in Table 1 is correct and, if necessary, provide any revisions as redline changes to this document. Please address the requested information in Table 2 and complete the Asset Verification Form provided in this communication. Return all information to: ERO@nerc.org from Regional Registration group via the process indicated in Table 3 to your region within 14 days of this letter. **Please do not return the information to NERC.**

¹ NERC Rule 27 Transmittal Appendix
² <https://www.ferc.gov/energy-information-administration>

RELIABILITY | RESILIENCE | SECURITY



Self-Certifications with Internal Controls Questions

October 17, 2024

Fahad Ansari, Senior Technical Advisor
Stacia Carron, Manager, Entity Monitoring

Introduction

- WECC's reliability and security priorities are committed to addressing known and emerging risks in the Western Interconnection
- Registered entities were selected for Self-certification based on entity footprint, generation portfolio, geographic location, and compliance history
- Self-certification Scope:
 - EOP-011-2 R7, R8
 - CIP-003-8 R2 Attachment 1 Sections 2, 3, and 5

Cold Weather Preparedness

- Resilience to Extreme Events (2023 ERO Reliability Risk Priorities Report)
- Extreme Weather Response (2024 CMEP Implementation Plan)
- 2022 Winter Storm Elliott report
- Major concerns:
 - Implementation of generator freeze protection measures
 - Implementation of enhanced cold weather preparedness plans
 - Annual training for generator maintenance and operations personnel

Critical Infrastructure Protection (CIP)

- Physical security controls
- Electronic access controls
- Transient cyber asset and removable media malicious code risk mitigation

Self-Certification Expectations

- Review the applicable Standards and determine whether your entity is:
 - Compliant,
 - Non-compliant,
 - Not Applicable, or
 - Does Not Own.
- Provide brief, narrative responses to each question in Align.
- Please DO NOT submit any separate documents or evidence as part of your response.

Future Steps

- Identify best practices
- Assess whether additional monitoring and outreach is needed
- Incorporate information collected into Compliance Oversight Plans
- Conduct more Self-certifications for low inherent risk entities in other geographic locations within the Western Interconnection



www.wecc.org



RELIABILITY & SECURITY

Oversight Monthly Update

November 21, 2024, 2:00 p.m. MT



Follow and engage!
@weccreliability