

RELIABILITY & SECURITY

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Roadmap for Small Entities and Primary Compliance Contacts and Understanding CORES Roles

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Stacia Carron, Manager, Entity Monitoring

Jessica King, Compliance Program
Coordinator

What You Will Learn and Why it Matters

- Understand WECC CMEP structure
- Resources for frequently asked questions
- Overview of permissions for CORES, Align, GMD, and MIDAS applications
- You will use the platforms and resources—*all CMEP processes are dependent on these tools* – becoming familiar with them will set you up for success

WECC Reliability & Security Oversight



Inherent Risk

Inherent risk requires identification and aggregation of individual risk factors related to each registered entity, and the consideration of the significance of BPS reliability impacts for identified risks.

Getting Started

- Do you know what your compliance responsibilities are?
- Who is responsible for compliance tasks? Who is their backup?
- Are compliance responsibilities built into daily job functions?
- How and when do you assess your compliance responsibilities?

Let's go over some resources to help you...

WECC Generator Welcome Package

- The Welcome Package provides entities with a framework to prepare a Generator Owner (GO) and Generator Operator (GOP) for its compliance obligations and to internally assess the GO's and GOP's state of compliance.
- WECC Generator Welcome Package:
<https://www.wecc.org/Administrative/Generator%20Welcome%20Package.pdf>
- ERO Enterprise 101 Informational Package:
https://internal.wecc.org/Administrative/ERO_Enterprise_101_Informational_Package.pdf

CMEP Implementation Plan (IP)

- The Electric Reliability Organization (ERO) Enterprise Compliance Monitoring and Enforcement Program (CMEP) Implementation Plan (IP) reflects ERO and Regional Entity-specific risk elements that Compliance Enforcement Authorities (CEAs) should prioritize for oversight of registered entities.
- ERO CMEP Implementation Plan:
<https://www.nerc.com/pa/comp/CAOneStopShop/ERO%20CMEP%20Implementation%20Plan%20v1.0%20-%202024.pdf>

NERC One Stop Shop

- The NERC One Stop Shop lists commonly used documents related to the CMEP.
- Examples:
 - CIP ERT
 - ERO Enterprise Periodic Data Submittal Schedule
 - Implementation Guidance
 - Frequently Asked Questions
- NERC One Stop Shop:
<https://www.nerc.com/pa/comp/Pages/CAOneStopShop.aspx>

The ERO Risk Framework

- The ERO Enterprise Risk-Based Compliance Oversight Framework (Risk Framework) focuses on identifying, prioritizing, and addressing risks to the bulk power system (BPS).
- Reliability risk is not the same for all registered entities, therefore, the Risk Framework examines BPS risk of registered entities (both collectively and individually) to determine the most appropriate CMEP tool to use when monitoring a registered entity's compliance with NERC Reliability Standards.
- The ERO Enterprise is currently reviewing and updating the documented Risk Framework.

NERC Lessons Learned

- These documents are designed to convey lessons learned from NERC's various activities.
- Examples of Lessons Learned:
 - Combustion Turbine Anti-Icing Control Strategy
 - Loss of Energy Management System Functionality due to Server Resource Deadlock
 - Managing UFLS Obligations and Service to Critical Loads during an Energy Emergency
- NERC Lessons Learned:
<https://www.nerc.com/pa/rrm/ea/Pages/Lessons-Learned.aspx>

ERO Enterprise Tools

Applications



ERO Portal

A tool that provides users
the keys to the kingdom

Align

CORES

GMD

MIDAS

Request access to NERC data stores,
extranet sites, and web applications

Update access permissions for ERO Portal
applications: CORES, MIDAS, GMD
External applications: Align

See which NERC data stores, extranet
sites, and web applications the user has
access to

Contact Roles

Assigned in CORES

Must have ERO Portal accounts associated with an individual email address

Primary Compliance Contact (PCC)

- Receives all WECC compliance communications and system generated emails from the applications.
- Automatically granted Entity Administrator, Align Registered Entity Submitter, and SEL Submitter permissions.

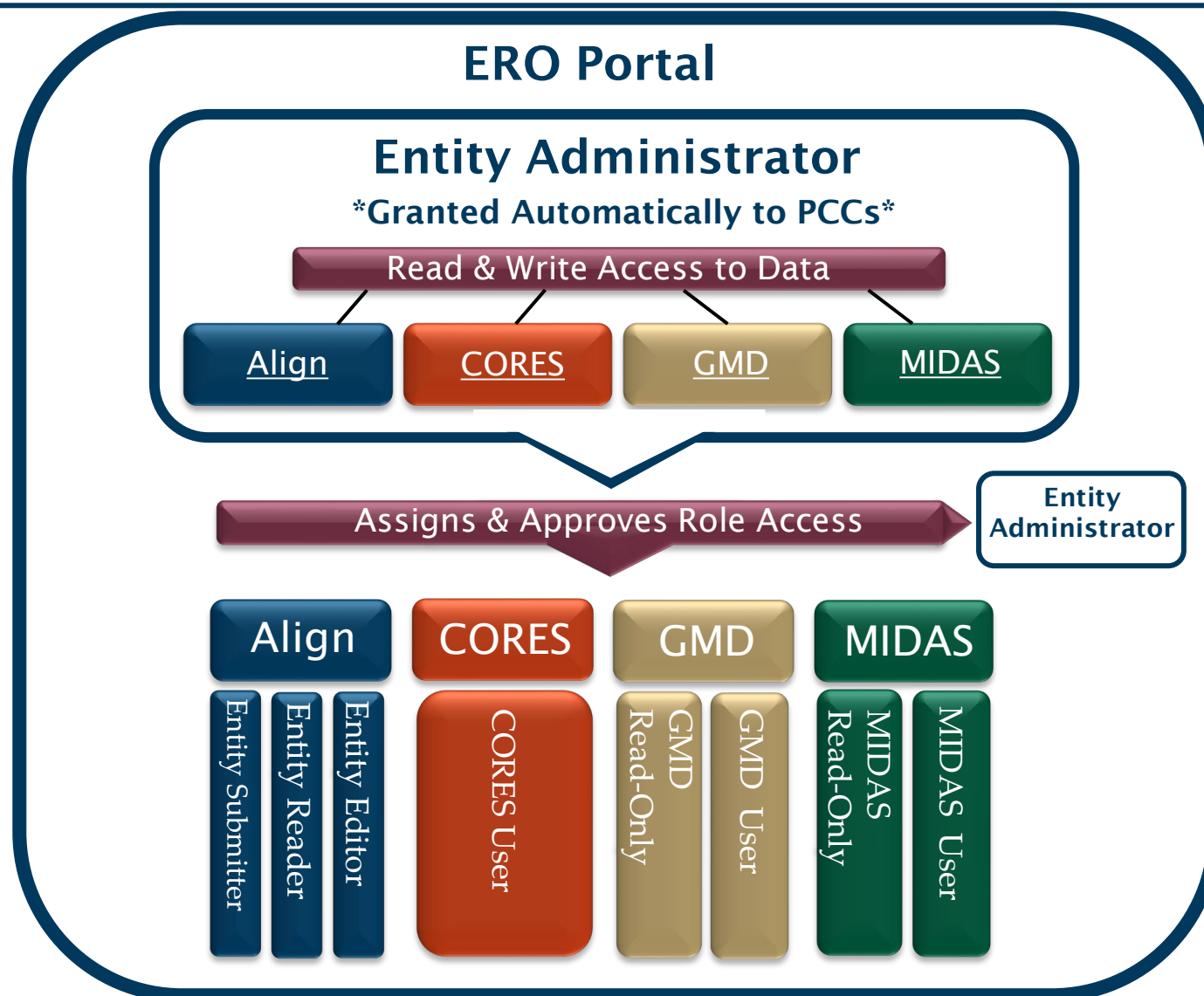
Alternate Compliance Contact (ACC)

- Backup to the PCC.
- Copied on all compliance communication and receives system generated emails.

Primary Compliance Officer (PCO)

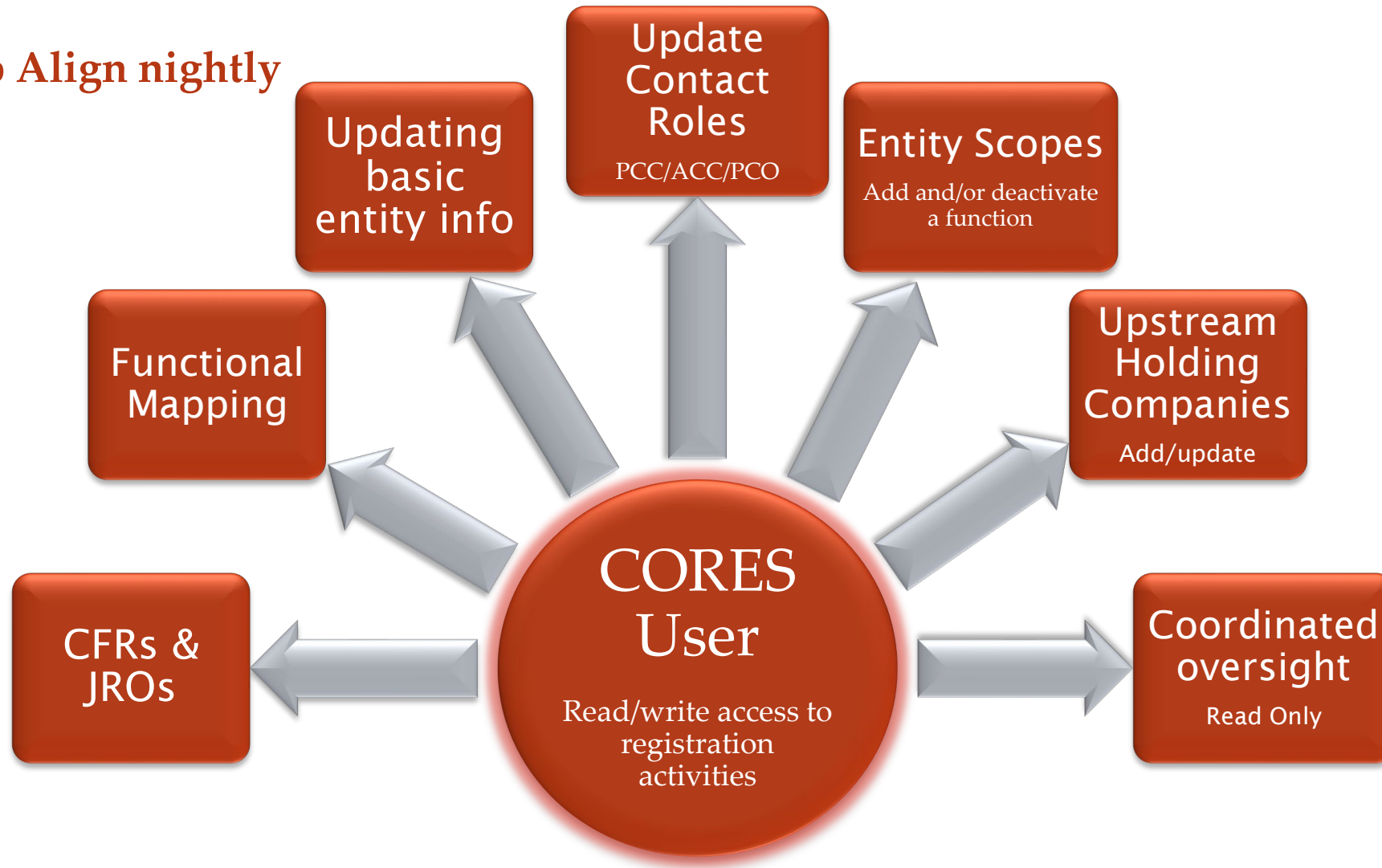
- Was called Authorizing Officer.
- Management-level contact responsible for regulatory affairs.
- Usually the authorized signatory for organization.
- Receives or is copied on key compliance communications:
 - Notices about alleged violations,
 - Notices about non-submittal of requested data.
- NOT contacted for system communications from ERO Portal.

System Roles (Permissions)



CORES Work

- Syncs to Align nightly



Align User Roles (Permissions)



Align Work

Self-Reports/Logs; Mitigation Management; Enforcement Processing

- Create findings
- Add mitigation milestones
- Respond to Requests for Information (RFI)

Self-Certifications

- Respond to Self-Certification Request
- Respond to RFI
- Submit Requests for Extension
- Create attestations
- Reaffirm attestations

Audits and Spot-Checks; Risk and Planning

- View scheduled engagements
- Respond to working papers
- Respond to RFI
- Object to team members

Align Work

Periodic Data Submittals

- Submit Self-Certification
- Respond to RFI
- Requests for Extension
- Attestations

IRA and COP

- Respond to Inherent Risk Assessment (IRA)
- Questionnaire
- View/Download Compliance Oversight Plan (COP)

Technical Feasibility Exception (TFE)

- Create TFE
- Respond to RFI
- Terminate TFE

Have I been granted the appropriate Permissions?

Yes

Submit a
ticket to
NERC

No

Contact PCC

Resources

- Update contact information
 - [CORES End User Guide \(nerc.com\)](#) Chapter 2, Contact Roles
- Review and Approve Align Access Request
 - [Align User Guide - Registered Entity Request Access Process \(nerc.com\)](#)
- Making assignments for Self-Certification or PDS
 - [PDS and Self Cert Changes.pdf \(wecc.org\)](#)
- Responding to Periodic Data Submittals
 - [PDS Reporting Guide.pdf \(wecc.org\)](#)
- Attestations
 - [NERC Learning—Training Material for NERC Professionals](#), Section 8

