

RELIABILITY & SECURITY

Workshop - Tempe, Arizona



March 25–26, 2025

The NERC logo consists of the letters "NERC" in a bold, black, sans-serif font. A horizontal blue bar is positioned directly beneath the letters.

NORTH AMERICAN ELECTRIC
RELIABILITY CORPORATION

NERC Supplemental Filing: CMEP Enhancements

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WECC Reliability and Security Workshop

March 25, 2025

RELIABILITY | RESILIENCE | SECURITY

Five Year Performance Assessment Filing



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graph TD; A[Five Year Performance Assessment Filing] --> B[Supplemental Filing]; B --> C[FERC Order in Response];
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Supplemental Filing

FERC Order in Response

Performance Assessment Timeline

July 19, 2024 – NERC
submits performance
assessment

November 8, 2024 –
NERC submits
supplemental filing

December 19, 2024 –
FERC accepts the
assessment

Required by FERC

Performed every FIVE years

Demonstrates that NERC and Regions are fulfilling Federal Power Act 215 responsibilities

Filed on July 19, 2024, covering 2019 through 2023

- Standard Process Enhancements
- Compliance Exception Processing Enhancements



- Abeyance – When, What, and How?

- Framework established in Supplemental Filing

- Current Standards / Projects

- Project 2024-03 Revisions to EOP-012-3 (Cold Weather) *

- *“From the effective date of **Reliability Standard EOP-012-3** until **October 1, 2027**, the Compliance Enforcement Authority will not pursue an action under Sections 4A.0 or 5.0 of Appendix 4C to the Rules of Procedure for a failure to comply with **Reliability Standard EOP-012-3 Requirement R1 Part 1.1** with respect to the **calculation of the Extreme Cold Weather Temperature** for an applicable generating unit, or any other failure to comply resulting from an incorrect calculation of the Extreme Cold Weather Temperature for that generating unit, against any entity acting in good faith to comply with the standard in accordance with the relevant implementation plan.”*

- Abeyance observations feedback to Standards for possible enhancements

* <https://www.nerc.com/pa/Stand/Pages/Project-2024-03-Revisions-to-EOP-012-2.aspx>

Compliance Exception Processing Enhancements



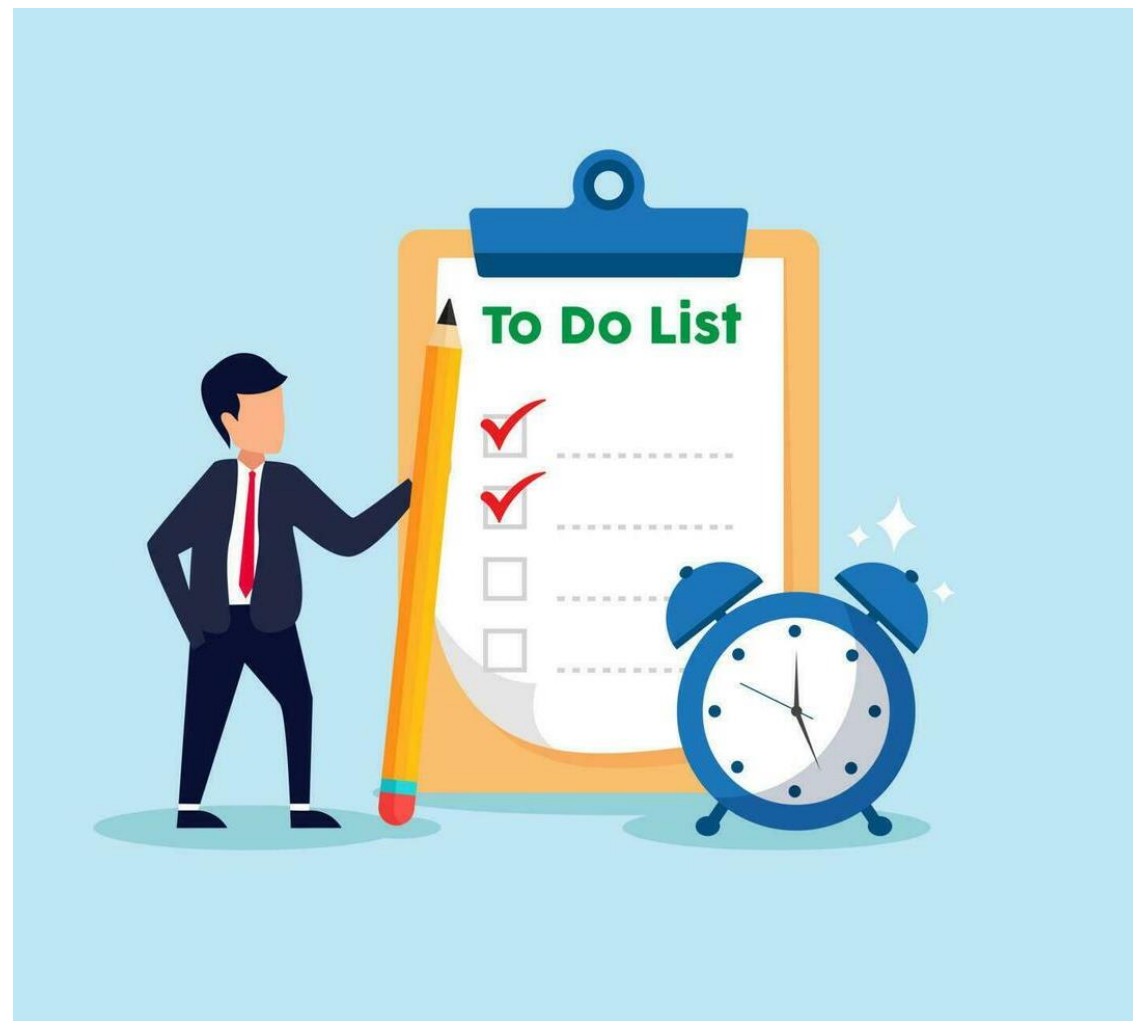
Challenges

- Delayed processing
- Inordinate time spent on minimal-risk issues

Solution

- Streamlined processing
- Metrics tracking

- Accepted NERC's 2024 Performance Assessment
- Directed NERC to develop key metrics
 - Standards Development
 - CMEP implementation and oversight
- Directed NERC to submit filing within 180 days of Order



Value to ERO Enterprise and Stakeholders



ERO Enterprise Risk-based Focus

Focus on the higher risk noncompliance
Identify trends, themes, patterns, and lessons learned



Registered Entity Assistance

Comprehensive self-reports
Engage with Regional and/or NERC staff

Supplemental Filing: Common Questions

- Will all Standards / Requirements have an abeyance period?
- Where will the abeyance language be in the Standard?
- What if I'm not audited during the abeyance period?
- What current Standards or Projects have been flagged for abeyance?
- Will the supplemental filing impact the self-logging process?
 - Does abeyance diminish the value to sign up for self-logging

Supplemental Filing: Common Questions, cont.

- How are projects considered for abeyance?
 - Inclusive of existing Standards that are changing?
 - Only new Standards?
- Does the information feed back to Standards for possible enhancements?
- Briefly describe the feedback loop from Compliance or Enforcement to Standards.

A map of North America, including the United States, Canada, and Mexico. A horizontal band of varying shades of blue and grey stretches across the middle of the map, passing through the United States. The text "Questions and Answers" is centered within this band.

Questions and Answers