



# RELIABILITY & SECURITY

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Oversight Monthly Update

February 20, 2025 | 2:00 p.m. MT



# Reliability & Security Oversight Monthly Update

February 20, 2025

Mailee Cook, Training and  
Outreach Specialist



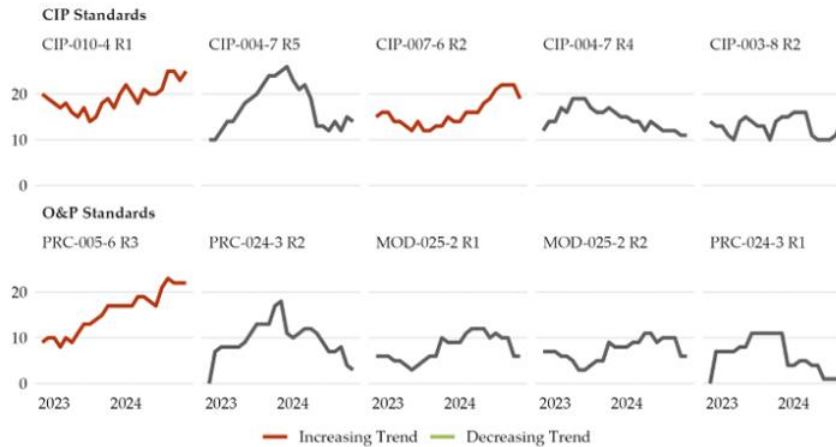
1:55 pm Wed 10 Jul

wecc.org



Electric Reliability and Security for the West

#### Most-Reported Requirements



## OVERSIGHT TRENDS UPDATE

Q1 2025

Available  
now on  
WECC.org



# Grid *FUNDAMENTALS*

Virtual, February 25-26  
9:30 a.m. to 2:00 p.m.







# RELIABILITY IN THE WEST

A DISCUSSION SERIES





# RELIABILITY & SECURITY

Workshop - Tempe, Arizona



March 25–26, 2025

# Antitrust Policy

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- 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

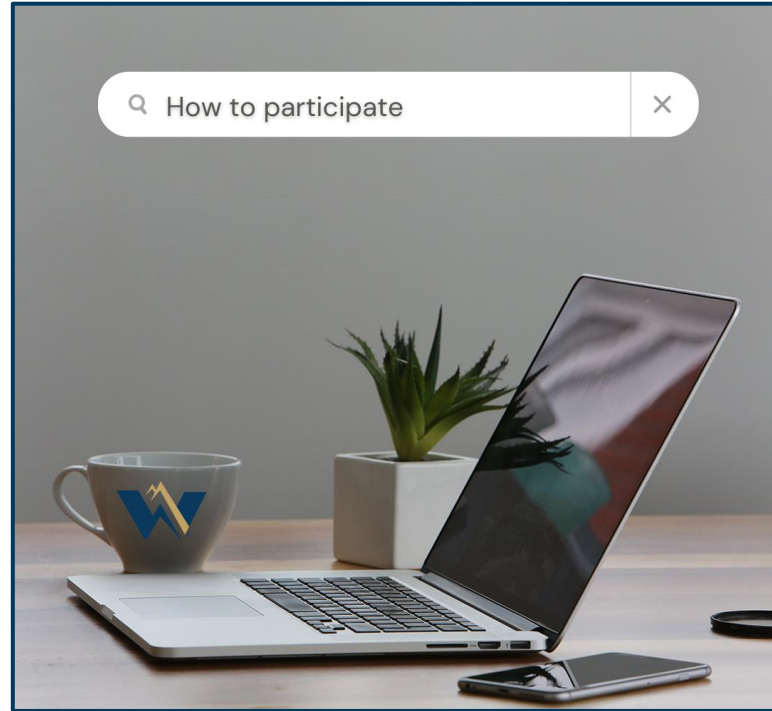
# Antitrust Policy

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- 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

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- Standards Feedback Team and Standards Update
  - Donovan Crane, Senior Engineer, WECC
- Inverter-based Resources Initiative Update
  - Mark Rogers, Manager, Registration & Certification, WECC
  - Abby Fellingner, Senior Registration & Certification Engineer
- The First RFIs at Audit: CIP Evidence Request Tool and O&P Spreadsheet
  - Teri Kelly, Cybersecurity Auditor, WECC
  - Tom Williams, Entity Monitoring Manager, WECC





# Standards and Standards Feedback

February 20, 2025

Donovan Crane  
Senior Engineer, Standards

# Current Projects—WECC

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- WECC-0142 Retire BAL-002-WECC
  - Comments supporting retirement complete
  - Going to WSC to request approval to ballot project
- WECC-0156 VAR-001 Voltage and Reactive Control Potential Modification to WECC Regional Variance
  - Current language in Variance E.A.13 Specifies “each generation resource that is part of the BES”
  - Recent registration of smaller units that don’t meet the definition of BES would be excluded with this language
  - Drafting team solicitation is underway



# Current Projects: NERC—Cold Weather

- 2024-03 Revisions to EOP-012-2 Cold Weather Project
  - Comment period closes March 12, 2025—No ballots associated with this posting
  - Will not be another ballot/comment period. Comments will be considered but will not delay submission to FERC
  - Efforts by drafting team members and industry continuing development of Implementation Guidance for ECWT calculation
  - Internal ERO Enterprise team discussing design aspects of the EOP-012-3 CAP Extension and Generator Cold Weather Constraint process in Align
  - [Abeyance language has been updated in the Standard](#)

# Current Projects: NERC-FERC 901

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- 2022-02 Uniform Modeling Framework for IBR
- 2021-01 System Model Validation with IBRs
- 2020-06 Verification of Models and Data for Generators
- Projects are working toward April 2025 for initial ballot
  - Because of shortened time frame (submission date of Nov 4, 2025) there will be shortened ballot/comment periods
  - There will also be a limited number of ballot/comment periods. There will be two, then some tough decisions will need to be made





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# Inverter-based Resources Initiative Update

February 20, 2025

Mark Rogers, Manager, Registration &  
Certification

Abby Fellingner, Senior Registration and  
Certification Engineer



# The First RFIs at Audit

February 20, 2025

Teri Kelly  
Tom Williams



# Agenda

What are the first requests for information (RFI) that WECC will send for audits?

When will WECC typically send these RFIs, and when will they be due?

The information in these slides applies to audits in the United States.

# The First Three RFIs

Internal controls data collection template (ICDCT)

O&P evidence spreadsheet

CIP evidence request tool (ERT)

Tailoring

- The ICDCT will be tailored to the risk-based audit objectives and scope.
- The O&P evidence spreadsheet and the CIP ERT will be tailored to the audit scope.
- Based on audit objectives, tailoring might vary but would be communicated accordingly.

# Timing and Additional RFIs

The intent of these first RFIs is for WECC auditors to have the necessary information to plan fieldwork.

WECC will send the ICDCT about six months before audit commencement, due 60 days later.

WECC will send the CIP ERT and the O&P evidence spreadsheet 120 days (or the Friday prior) before audit commencement, due 60 days later.

WECC auditors could send additional RFIs as the audit progresses, though there have been audits for which the only additional RFIs were for interviews.



# The ICDCT

The ICDCT requests a description of internal controls your organization uses to mitigate risks identified for the audit

A blank ICDCT is publicly available on WECC's website

WECC.org > Program Areas > Compliance > United States > Internal Controls Information and Tools

WECC will not be providing an internal control assessment report based on the information provided here, but the result of the audit team assessment will be reflected in the Compliance Oversight Plan.

Enter information on the "WorkPaper" tab. Other tabs contain supporting information and should not be modified. Start by placing your entity's name in Row 1; place the name of the person responsible for submitting this file to WECC in Row 2 (include the person's phone number and email address); place the date in Row 3.

In the instructions, below, when WECC enters the information, it appears in columns highlighted in gray and information entered by the Registered Entity appears in columns highlighted in green.

Please indicate if you are providing evidence with this response, referencing evidence that will be provided with the CIP ERT or with working papers, or referencing evidence available upon request.

Please also provide to WECC any enterprise-wide internal controls program document(s) your entity may have and your entity's Internal Compliance Program document(s).

[Instructions](#)
[WorkPaper](#)
[Risk Categories](#)

# The O&P Evidence Spreadsheet

The O&P evidence spreadsheet is based on the compliance assessment approach in Reliability Standards Audit Worksheets (RSAW).

The untailored spreadsheet is publicly available on WECC's website

WECC.org > Program Areas > Compliance > United States > Audits

This spreadsheet will be tailored to scope and sent with the notice of audit



	A	B	C	D	E	F
1	Please submit the following listed documentation in addition to any other specific documents you are providing to demonstrate compliance with the Standard Requirements within the scope of your engagement. The data and documents below is to support demonstrating compliance in the past and the possibility of maintaining compliance in the future. Some requested items are company and program level documents for review and to provide for sampling guidance. Please submit the requested documentation using the associated Secure Evidence Locker (SEL) reference ID (Column F). <b>Note Column G is in transition and requires data entry on the "Ref" tab to be utilized. The current text shown is example data (which can be overwritten).</b> The SEL reference IDs provided in Row 4 and Row 5 which are specifically provided to capture PRC-005 information and single line diagrams. If a Requirement is in scope, WECC expects to supply the associated "Initial Evidence Request" line item(s).					
2	Evidence Request (ER) ID	Standard	Registered Function	Requirement	Initial Evidence Request	SEL Reference ID for Upload (To be removed for auto-population in future versions)
94	EOP-012-R1-ER-01	EOP-012-2	GO	R1	Provide each applicable generating unit's ECWT, the ECWT source, the ECWT raw data, and the associated ECWT calculation date (subject to CEA sampling). If data was missing, provide a brief description of how the entity managed the ECWT calculation process.	WECC NCR0nnnn ME24-000nn ME24-000nn EOP-012-2
95	EOP-012-R1-ER-02	EOP-012-2	GO	R1	Provide identified generating cold weather data for each applicable generating unit (subject to CEA sampling.)	WECC NCR0nnnn ME24-000nn ME24-000nn EOP-012-2
96	EOP-012-R1-ER-03	EOP-012-2	GO	R1	Provide the process for review of ECWT and development of Corrective Action Plans (if applicable) in accordance with Requirement R1.	WECC NCR0nnnn ME24-000nn ME24-000nn EOP-012-2
97	EOP-012-R2-ER-01	EOP-012-2	GO	R2	List of entity's applicable generating unit(s) (with a commercial operation date on or after October 1, 2027) Extreme Cold Weather Temperature (ECWT) determined to be at or below 32 degrees Fahrenheit (zero degrees Celsius) that self-commits or is required to operate at or below a temperature of 32 degrees Fahrenheit (zero degrees Celsius.)	WECC NCR0nnnn ME24-000nn ME24-000nn EOP-012-2
98	EOP-012-R2-ER-02	EOP-012-2	GO	R2	Documentation demonstration of the implemented freeze protection measures to meet the criteria in accordance with Requirement R2.	WECC NCR0nnnn ME24-000nn ME24-000nn EOP-012-2
99	EOP-012-R2-ER-03	EOP-012-2	GO	R2	If applicable, Corrective Action Plan documentation (including dates of corrective actions.)	WECC NCR0nnnn ME24-000nn ME24-000nn EOP-012-2
100	EOP-012-R3-ER-01	EOP-012-2	GO	R3	List of entity's applicable generating unit(s) (with a commercial operation date prior to October 1, 2027) Extreme Cold Weather Temperature (ECWT) determined to be at or below 32 degrees Fahrenheit (zero degrees Celsius) that self-commits or is required to operate at or below a temperature of 32 degrees Fahrenheit (zero degrees Celsius.)	WECC NCR0nnnn ME24-000nn ME24-000nn EOP-012-2
101	EOP-012-R3-ER-02	EOP-012-2	GO	R3	Documentation demonstration of the implemented freeze protection measures to meet the criteria in accordance with Requirement R3.	WECC NCR0nnnn ME24-000nn ME24-000nn EOP-012-2

# The CIP ERT—Two RFIs in One

The CIP ERT has a “level 1” RFI due 60 days before audit commencement and a “level 2” RFI due thirty days before audit commencement.

“Level 1” involves processes, procedures, Cyber Assets, and other information tailored to scope.

“Level 2” involves evidence of the implementation of the processes and procedures.

Based on the scope, evidence of implementation could be based on sampling of Cyber Assets.

# CIP Evidence Request Tool

The screenshot displays the NERC (North American Electric Reliability Corporation) website. The header includes the NERC logo (1), a search bar, and links for Account Log-In/Register and Contact Us. The main navigation bar (2) features links for About NERC, Career Opportunities, Governance, Committees, Program Areas & Departments, Standards, Initiatives, Reports, and Filings & Orders. A dropdown menu for Program Areas & Departments (3) is open, showing options like Compliance & Enforcement, Organization Registration and Certification, Standards, Electricity ISAC, Event Analysis, Reliability Assessment, and Performance Analysis, Bulk Power System Awareness, and System Operator Certification & Credential Maintenance Program. The left sidebar (4) lists various programs, with 'One-Stop Shop (Compliance Monitoring & Enforcement Program)' highlighted. The main content area (5) shows the 'One-Stop Shop (Compliance Monitoring & Enforcement Program)' page, which includes a description, a list of documents, and a table of active documents. A callout (6) points to the 'CIP ERT & User Guide (3)' link in the document list.

**One-Stop Shop (Compliance Monitoring & Enforcement Program)**

Align and Secure Evidence Locker

Compliance Assurance

Compliance Guidance

Compliance Investigations

Compliance Analysis and Certification

Compliance Hotline

ERO Enterprise Program Alignment Process

Regional Audit Reports of Registered Entities

Risk-Based Compliance Monitoring and Enforcement Program (CMEP)

Organization Registration and Organization Certification

Organization Certification

Enforcement and Mitigation

CMEP and Vegetation Reports

Reliability Standards Audit Worksheet (RSAWs)

Centralized Organization Registration ERO

Home > Program Areas & Departments

**One-Stop Shop (Compliance Monitoring & Enforcement Program)**

The One-Stop Shop provides a central location for users to find and download documents related to the One-Stop Shop (Compliance Monitoring & Enforcement Program).

[ERO Enterprise Guidance: A Standard Noncompliance Related to Coronavirus Impacts](#) (May 10, 2021)

[COVID-19 Logging Spreadsheet - Template](#) (May 28, 2020)

[COVID-19 ORC and CMEP Frequently Asked Questions](#) (Updated June 25, 2020)

[FERC, NERC Provide Industry Guidance to Ensure Grid Reliability Amid Potential Coronavirus Impacts](#)

**One-Stop-Shop (CMEP, Compliance, and Enforcement) - Active**

Documents	Year	Category	Date
<b>Compliance (40)</b>			
<b>CIP ERT &amp; User Guide (3)</b>			
CIP Evidence Request Tool Master v9	2025	CIP ERT & User Guide	1/24/2025
CIP Evidence Request Tool Release Notes v9	2025	CIP ERT & User Guide	1/24/2025
CIP Evidence Request Tool User Guide v9	2025	CIP ERT & User Guide	1/24/2025



# CIP ERT V9—Level 1 Updates

## V8

Detail Tab or Request ID	Standard	Requirement	Initial Evidence Request Required in RSAW and NERC Evidence Request Spreadsheet	For use by Region
				Response Due Date
CIP-002-R1-L1-07	CIP-002-5.1a	R1	Relating to each of the asset types (refer to column "Asset Type" of BES Assets tab) owned, provide a list of example devices, types, and/or classes that were determined not to meet the BES Cyber Asset definition. Include supporting explanations for resulting determination.	

Deleted

## V9

Detail Tab or Request ID	Standard	Requirement	Evidence Request
CIP-002-5.1a-R1-L1-07	CIP-002-5.1a	R1	<p>Provide a list of example devices, types, and/or classes that were determined not to meet the BES Cyber Asset definition for Cyber Assets associated with each of the following BES Asset types, and include explanations for the resulting determination:</p> <ul style="list-style-type: none"> <li>- Control Center</li> <li>- Substation</li> <li>- Generation</li> <li>- System Restoration</li> <li>- SPS/RAS</li> <li>- DP Protection System</li> <li>- Associated Data Center</li> </ul> <p>See the User Guide for additional guidance regarding this request.</p>

Updated to include version

Updated Requests:  
 CIP-002-5.1a-R1-L1-05  
 CIP-002-5.1a-R1-L1-07  
 CIP-012-1-R1-L1-02

Added Requests:  
 CIP-003-9-Rx-Ly-zz  
 CIP-012-2-Rx-Ly-zz

# CIP ERT V9—Level 2 Updates

## V8

Request ID	Standard	Requirement	Sample Set	Sample Set Source & Description	Sample Set Evidence Request	Sample Set Index Number	Entity Response
CIP-010-R4-L2-02	CIP-010-4	R4 Sect 1	TCA-L2-04 SS-DATE-06	Source Tab: TCA  Description: Sample of Transient Cyber Assets managed by the Responsible Entity in an on-demand manner	For each TCA managed in an on-demand manner in Sample Set TCA-L2-04, for the range of dates in SS-DATE-06, provide: 1. Cyber Asset ID of BCA/PCA or BES Cyber System ID Accessed; 2. Date(s) and Time(s) of Access; 3. The user authorizations; 4. The location authorizations; 5. The use authorizations, including evidence that the use is necessary to perform a business function. 6. Software vulnerability mitigation; 7. Mitigation steps to prevent introduction of malicious code; and 8. Methods in place to prevent unauthorized use.	TCA-L2-04: NA  SS-DATE-06: TBD	Deleted

## V9

Request ID	Standard	Requirement	Sample Set	Sample Set Source & Description	Sample Set Evidence Request
CIP-010-4-R4-L2-02	CIP-010-4	R4 Sect 1	TCA-L2-04 SS-DATE-06	Source Tab: TCA  Description: Sample of Transient Cyber Assets managed by the Responsible Entity in an on-demand manner	For each TCA managed in an on-demand manner, either individually or by group, in Sample Set TCA-L2-04, for the range of dates in SS-DATE-06, provide: 1. Cyber Asset ID of BCA/PCA or BES Cyber System ID Accessed; 2. Date(s) and Time(s) of Access; 3. The user authorizations; 4. The location authorizations; 5. The use authorizations, including evidence that the use is necessary to perform a business function. 6. Software vulnerability mitigation; 7. Mitigation steps to prevent introduction of malicious code; and 8. Methods in place to prevent unauthorized use.

Updated  
to include  
version

Added Sample Set:  
Personnel-L2-02

Updated Request:  
CIP-010-4-R4-L2-02  
Added Requests:  
CIP-003-9-Rx-Ly-zz  
CIP-012-2-Rx-Ly-zz

# CIP ERT V9—Level 2 Updates

CA worksheet updated to default row count from 3,000 to 10,000.

On Personnel worksheet, column “*Was Access Authorized During Audit Period?*” requires selection of the specific access types for each user (Electronic, Physical, and/or BCSI access).

CIP ERT user guide updated with clarifications and reformatted to improve ease of use.







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