



# **Reliability & Security Oversight Update**

**WECC**

**September 18, 2025  
2:00–3:00 p.m. Mountain**

# Reliability & Security Oversight Update

**Mailee Cook**

*Training & Outreach Specialist*

**Electric Reliability  
& Security for the West**

September 18, 2025

## GridSecCon 2025

- October 7–10, 2025 | MGM Grand, Las Vegas, NV
- Over 650 professionals from industry, government, and regional entities
- Ideal for security, reliability, compliance, and executive roles
- Regular registration open through September 23
- Hands-on trainings and sessions with practical strategies to boost security and reliability

[Register here](#)





# **Reliability & Security Workshop**

**WECC**

**October 14–15, 2025  
San Diego, California**



**Grid Fundamentals**

**WECC**

**November 4–5, 2025**  
**Virtual**



# RELIABILITY IN THE WEST

A DISCUSSION SERIES



## GridEx

Hosted every two years by the E-ISAC, GridEx gives E-ISAC member and partner organizations a forum in which to practice how they would respond to and recover from coordinated cyber and physical security threats and incidents.

- GridEx VIII will be held on November 18-19, 2025
- GridEx VII had more than 15,000 participants
- The E-ISAC releases a public report after every GridEx
- Register here: <https://www.eisac.com/s/register-for-gridex>.



GridEx

## New Participation Options

### STANDARD SCENARIO

- Default GridEx experience
- Move Zero in the week leading up to the exercise
- 2-day full-scale exercise
- Cyber and physical attack scenario unfolding in real-time
- Extra focus on recovery to end the exercise
- Engage all aspects of organizational response
- Partner with external organizations
- Enhance your exercise with media and social media simulation
- Access to the Exercise E-ISAC Portal

### GRIDEX IN A BOX

- 2-day functional exercise
- Abbreviated scenarios customized for smaller planning teams
  - Cyber-focused scenario
  - Physical-focused scenario
- Specialized Exercise Plan designed for staging a real-time exercise on limited resources
- Aligns with the Standard Scenario, enabling external engagement
- Media and social media simulation
- Access to the Exercise E-ISAC Portal

### TABLETOP SCENARIO

- 1-day Discussion-based Tabletop Exercise
- Designed to be "Plug and Play"
- Facilitator guide and slide deck, enabling a single person to deliver a challenging exercise
- Engage internal and external partners in a broad discussion
- In-person or remote



# **Electromagnetic Transient (EMT) Strategic Workshop**

**November 19–20  
WECC Office  
Salt Lake City, UT**





# **Reliability & Security Oversight Update**

**WECC**

**November 20, 2025  
2:00–3:00 p.m. Mountain**

# 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

# How to Participate

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**Send questions and concerns via Chat**



**Use the “Raise Hand” feature and share**

# Agenda

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- **NERC and WECC Happenings**
  - Fahad Ansari, Senior Technical Advisor, WECC
- **Cold Weather Update**
  - Curtis Crews, Senior Technical Advisor, WECC
- **NERC and WECC Standards Updates**
  - Donovan Crane, Senior Engineer, Standards, WECC
- **Inverter-based Resources Initiative Update**
  - Abby Fellingner, Senior Registration & Certification Engineer, WECC
  - Mark Rogers, Manager, Registration & Certification, WECC
  - Andrew Williamson, Senior Registration & Certification Engineer, WECC
- **Align Update**
  - Angela Shapiro, Manager, Oversight Analysis & Administration, WECC
  - Ben Aldous, Senior Analyst, Enforcement, WECC
  - Katie Calibo, Senior Mitigation Engineer, WECC
- **Effective Internal Compliance Programs**
  - Ben Aldous, Senior Analyst, Enforcement, WECC
  - Joshua Yang, Enforcement Attorney, WECC

# NERC and WECC Happenings

**Fahad Ansari**

*Senior Technical Advisor*

**Electric Reliability  
& Security for the West**



# NERC and WECC Happenings

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- Standards effective October 1, 2025
  - BAL-004-WECC-4—Automatic Time Error Correction
  - TOP-002-5—Operations Planning
- Cold Weather Preparedness Small Group Advisory General Session
  - Presentation and recording posted
- Currently Compliant Podcast
  - Episode 7 focuses on Abeyance
- Level 2 NERC Alert Posted
  - Large Load Interconnection, Study, Commissioning, and Operations
  - Cross-border Remote Access to Bulk Power System Elements—Deadline ended September 15
- Lesson Learned
  - IBR Control Interactions and Oscillatory Events

# Cold Weather Update

**Curtis Crews**

*Senior Technical Advisor*

**Electric Reliability  
& Security for the West**

# NERC and WECC Standards Updates

**Donovan Crane**

*Senior Engineer, Standards*

**Electric Reliability  
& Security for the West**

# NERC Standards Happenings

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- Order 901 Related Projects Ballot and Comment Period 2
  - 2022-02
    - MOD-032-2 Passed with 73.77% approval
    - IRO-010-6 Passed with 86.15% approval
    - TOP-003-8 Passed with 82.56% approval
  - 2021-01
    - MOD-033-3 Passed with 94.07% approval
  - 2020-06
    - MOD-026-2 Failed with 64.86% approval
- There will be a shorter third and final ballot period for the projects of as little as five days
  - Approved by NERC SC 9/17/2025
- Drafting Team Member Solicitation:
  - 2025-03—Order No. 901 Operational Studies Open through Today
  - 2025-04—Order No. 901 Planning Studies Open through Today

# WECC Standards Happenings

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- WECC-0157: PRC-006-5 Automatic Underfrequency Load Shedding, Update to the WECC Regional Variance
  - Drafting team met for the first time today
  - Working through initial redline
- WECC-0142: Request to Retire BAL-002-WECC-3, Contingency Reserve
  - Posted for NERC 45-day comment period
- Drafting Team Solicitations
  - WECC-0158: IRO-002-7, Reliability Coordination—Monitoring and Analysis with WECC Regional Variance, Five-year Review
  - WECC-0159: IRO-006-WECC-3 Qualified Path Unscheduled Flow (USF) Relief, Five-year Review

# Inverter-based Resources Initiative Update

**Abby Fellingner**

*Senior Registration & Certification Engineer*

**Mark Rogers**

*Manager, Registration & Certification*

**Andrew Williamson**

*Senior Registration & Certification Engineer*

# Align Update

**Angela Shapiro**

*Manager, Oversight Analysis & Administration*

**Ben Aldous**

*Senior Analyst, Enforcement*

**Katie Calibo**

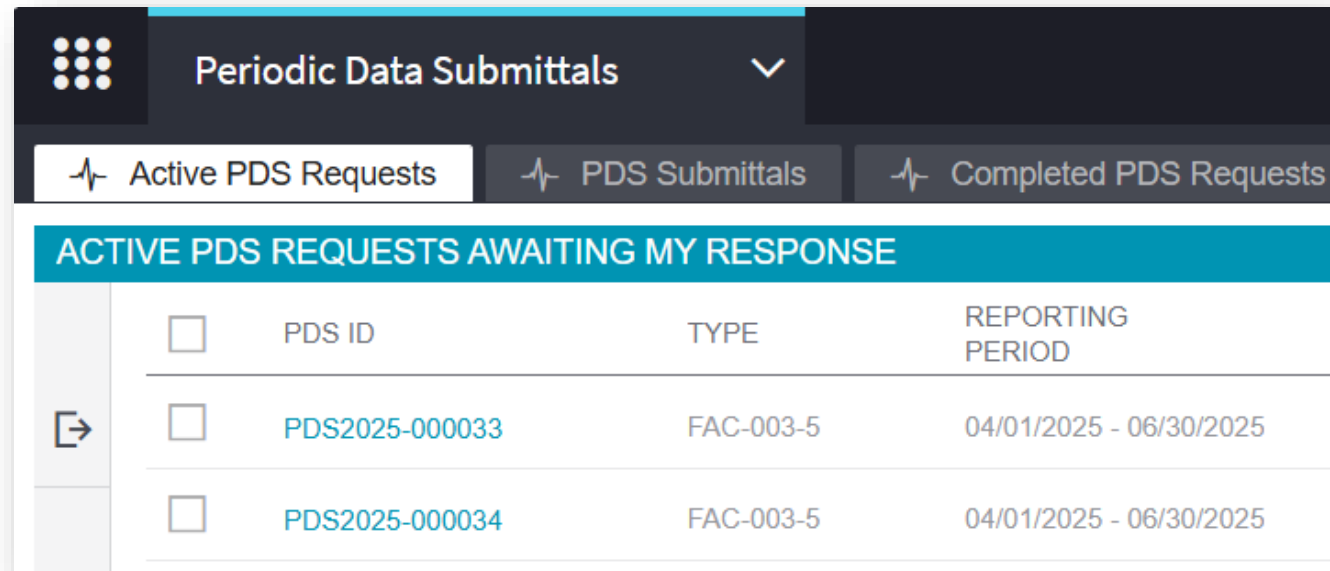
*Senior Mitigation Engineer*



# Periodic Data Submittal and Attestations

# Periodic Data Submittals (PDS)

- Align Release 7.3—July 2025
- Entities will receive separate PDS requests for each of their applicable functions (e.g., if the entity is a TO and a GO, they would receive one PDS request for the GO function and a second PDS request for the TO function)

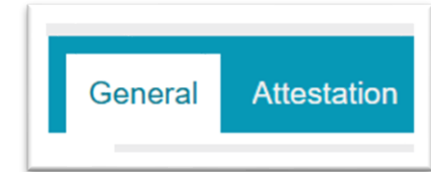


The screenshot shows a web interface for "Periodic Data Submittals". At the top, there is a dark header with a logo on the left, the title "Periodic Data Submittals" in the center, and a dropdown arrow on the right. Below the header, there are three tabs: "Active PDS Requests" (selected), "PDS Submittals", and "Completed PDS Requests". The main content area is titled "ACTIVE PDS REQUESTS AWAITING MY RESPONSE" in a teal bar. Below this is a table with four columns: a checkbox column, "PDS ID", "TYPE", and "REPORTING PERIOD". There are two rows of data, both with PDS IDs "PDS2025-000033" and "PDS2025-000034", both of type "FAC-003-5", and both with a reporting period of "04/01/2025 - 06/30/2025".

<input type="checkbox"/>	PDS ID	TYPE	REPORTING PERIOD
<input type="checkbox"/>	PDS2025-000033	FAC-003-5	04/01/2025 - 06/30/2025
<input type="checkbox"/>	PDS2025-000034	FAC-003-5	04/01/2025 - 06/30/2025

# Attestations

- Major overhaul to functionality with Release 7.3
- All attestations entered before July 12, 2025, will no longer be active
- Attestations must be created as part of an active monitoring activity (i.e., PDS or Self-Certification)
  - Cannot be created preemptively
- Attestations are strictly for Do Not Own or Not Applicable responses
- Next round of PDS will be an opportunity to provide updated attestations



# Resources

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- NERC [Attestation Training webinar](#)
- Updated NERC Training Guides
  - [PDS User Guide](#)
  - [Attestation User Guide](#)
- [NERC Align and Secure Evidence Locker \(SEL\) page](#)
  - Detailed release notes
  - User guides
  - Training webinar slides and links




<Limited-Disclosure>

# Align Release 7.4

# Align Release 7.4

- Mitigation completion certification
- Cause coding Self-Reports
- Email notification updates
- Bug fixes and performance enhancements
- [Release notes](#)
- [Align resource center](#)



## Align Release Notes

Release 7.4.0  
Date of Deployment: September 6, 2025

**Background**  
Align and the Secure Evidence Locker (SEL) are tools used by NERC, Regional Entities, and registered entities in the conduct of the ERO Enterprise Compliance Monitoring and Enforcement Program (CMEP). Initial training and training materials have been offered throughout the initial deployment of functionality (Releases 1, 2, 3, 4.0, and 4.5). Ongoing maintenance and enhancements to Align and the SEL (CMEP tools) will occur as needed to ensure effective implementation of the CMEP. Maintenance may include modifications to correct existing objects, notifications, records, workflows, etc. Enhancements may include new or improved functionality, workflows, reports, etc. These changes are expected as these CMEP tools are adjusted from their initial deployment to provide additional user functionality, efficiency, and enhancements to usability.

**Purpose**  
As changes are implemented to the CMEP tools, training and training materials provided during initial deployment may no longer be accurate. As part of an effective communication plan and to assure the effectiveness of user training, NERC is providing detailed release notes in this report. These release notes include detailed information regarding what features are changing or being added, what users are impacted by the changes, and if current training materials are impacted and have been updated. Users are encouraged to familiarize themselves with any changes that impact features or workflows regularly used.


**Terminology**  
Ongoing maintenance and enhancement of the CMEP Tools is conducted using an adaptive and iterative software development process. Terminology used within this document may refer to various processes most users may be unfamiliar with.

**CEA:** Compliance Enforcement Authority

**COP:** Compliance Oversight Plan

**IRA:** Inherent Risk Assessment

**Module:** Used to refer to a set of features used within Align. As shown in [Figure 1](#), each item that can be selected from the My Align drop-down menu is a Module. *Example: Risk and Planning*



**Figure 1: My Align Drop-Down Menu**

RELIABILITY | RESILIENCE | SECURITY

# Submitting Mitigating Activities

27 You can Certify Completion of the mitigation record from the Draft Finding upon creation from the Self Reports and Logs module ([see previous slides](#)) .

28 You can Certify Completion of the mitigation record from the **My Draft Mitigations** tab ([see previous slides](#)) for instructions

29 You can Certify Completion of the mitigation record from the **My Active** tab while it is in **CEA Processing** or **NERC Processing**. You will see **Save** only option, no **Save and Action** option (**a**).

30 If the mitigation record is in **Active** state, you will select the Submit for CEA Verification Review as normal ([see later slides](#)) You will see **Save** and **Save and Action** option, this is indicator you should Submit for CEA Verification Review as normal (**b**).

**Self Reports and Logs** 27

**Create New Self-Report or Log**

**Mitigation Management** 28

**My Draft Mitigations**

**Mitigation Management** 29

**My Draft Mitigations** **My Active Mitigations**

**Submit Finding:** Select "Submit" on the Action dropdown, then click the Save and Action button at the bottom of the screen.

**OPTIONAL - Submit Mitigations:** Submit mitigations now by checking the box "Submit Mitigations for Review with Finding?" or later via the "My Mitigations Tab". By submitting the mitigating activities described above, I acknowledge that I have authority to submit the mitigating activities on behalf of the Registered Entity.

**Delete Finding:** Select "Delete" on the Action dropdown, then click the Save and Action button at the bottom of the screen.

**Save a Draft:** Click the Save button at bottom of the screen. The CEA will not see this finding until the Registered Entity selects "Submit" on the Action dropdown and clicks the Save and Action button.

**Close:** Click the Close button at the bottom of the screen to close the window.

**Action \*** Submit

Submit Mitigations for Review with Finding? ☒

All Milestones Complete? ☒

**OPTIONAL - Submit Mitigation for CEA Verification Review:** Submit mitigation for CEA Verification Review now by checking the box "Submit Mitigations for Review with Finding?" and checking the subsequent box "All Milestones Complete?" The registered entity should only check the "All Milestones Complete?" checkbox if all milestones have been identified and included on the finding form and all milestones have a completion date.

I am an authorized representative of the Registered Entity and confirm, on its behalf, that the Mitigation as described above have been completed.

I am an authorized representative of the Registered Entity and confirm, on its behalf, that the Mitigating Activities as described above have been completed.

By submitting the Mitigating Activities for Certification of Completion, I acknowledge that I have authority to submit the Mitigating Activities on behalf of the Registered Entity and certify that:

1. I am an officer, employee, attorney, or other authorized representative of the Registered Entity;

2. All required actions described in Mitigating Activities have been completed; and

3. The Registered Entity has provided or will provide data or information sufficient for the Compliance Enforcement Authority to verify completion of the Mitigating Activities.

Ready for Region Review and Approval, Submit this Mitigation by selecting the "Submit for CEA Review" Action and clicking "Save and Action" below. By submitting this Mitigation, I acknowledge that I have authority to submit the mitigating activities on behalf of the Registered Entity.

**Action \*** Submit for CEA Review

**Save and Action** **Save** **Close**

**All Milestones are Complete** ☒

I am an authorized representative of the Registered Entity and confirm, on its behalf, that the Mitigating Activities as described above have been completed.

By submitting the Mitigating Activities for Certification of Completion, I acknowledge that I have authority to submit the Mitigating Activities on behalf of the Registered Entity and certify that:

1. I am an officer, employee, attorney, or other authorized representative of the Registered Entity;

2. All required actions described in Mitigating Activities have been completed; and

3. The Registered Entity has provided or will provide data or information sufficient for the Compliance Enforcement Authority to verify completion of the Mitigating Activities.

**Note: Once all milestones have been completed make sure you submit for CEA Review**

**Action \*** Submit for CEA Verification

**Save and Action** **Save** **Close**

**a** **b**

# Submitting Mitigating Activities



If you added all Mitigation Information and all Milestone have Actual Completion Dates, you have the ability to submit both the mitigation record to the Regional Entity for review as well as indicating that all Milestones have been completed and you are Certifying Completing of the Mitigation and Milestones.

19 To submit the mitigation record AND Certify Completion of the Mitigation record, you will check the box next to **All Milestones are Complete**

20 Select the **Submit for CEA Review** action

21 Click **Save and Action**

If all milestones do not have an Actual Completion Date (a), Align will give you an error message (b) indicating you cannot submit with the checkbox **All Milestones are Complete**, unless all milestones have Actual Completion Dates.

Mitigation Milestones

	<input type="checkbox"/> MILESTONE ID	TYPE OF MILESTONE TASK	MILESTONE NAME	PLANNED COMPLETION DATE	REVISED PLANNED COMPLETION	ACTUAL COMPLETION DATE
+	<input type="checkbox"/>	Corrective Control	Milestone Name 1	07/01/2025		07/01/2025
?	<input type="checkbox"/>	Preventative Control	Milestone Name 2	08/01/2025		

All Milestones are Complete

I am an authorized representative of the Registered Entity and confirm, on its behalf, that the Mitigating Activities as described above have been completed. By submitting the Mitigating Activities for Certification of Completion, I acknowledge that I have authority to submit the Mitigating Activities on behalf of the Registered Entity and certify that:  
1. I am an officer, employee, attorney, or other authorized representative of the Registered Entity;  
2. All required actions described in Mitigating Activities have been completed; and  
3. The Registered Entity has provided or will provide data or information sufficient for the Compliance Enforcement Authority to verify completion of the Mitigating Activities.

Instructions When ready for Region Review, Submit this Mitigation by selecting the "Submit for CEA Review" Action and clicking "Save and Action" below. By submitting the mitigating activities described above, I acknowledge that I have authority to submit the mitigating activities on behalf of the Registered Entity.

b

⚠

(You cannot Submit for CEA Review if you have checked All Milestones are Complete and they do not have an Actual Completion Date)

# Cause Codes

- Updated cause codes—Now available
- Root and contributing causes
- Self-Reports and Self-Logs
- [Cause Code User Guide](#)
- [Training video](#)

## Chapter 2: Enforcement Cause Codes

**Table 2.1** Lists the final enforcement cause codes by code name and description of the code and provides examples of root causes and their appropriate enforcement cause codes. These are meant to serve as a guide and do not represent the entire range of possible root causes of noncompliance.

Subject matter experts should keep in mind the enforcement cause codes as they review and evaluate the root cause of the noncompliance. The concurrent consideration should help with proper identification of the root cause and contributing cause of the noncompliance.

Code	Name and Description
1	<b>Change Management</b> - Made changes without understanding the downstream impact of the change on other components of the system and its related processes.
2	<b>Communication/Coordination – Internal</b> - Ineffective coordination or communication between personnel/departments within the same company. Lack of or poor coordination/communication within the same business unit and/or across business units sharing compliance obligations (organizational silos), which resulted in confusion regarding expectations and ownership of tasks.
3	<b>Communication/Coordination – External</b> - Ineffective coordination/communication between responsible parties, vendors, external entities. Lack of or poor coordination/communication with external individuals the entity relies upon for compliance obligations, which resulted in confusion by either internal or external individuals regarding expectations and ownership of tasks.
4	<b>Design – Ineffective Process Flow or System Design or failure of system/technology</b> - Items were missing from design, design-related documentation, or system or technology failure.
5	<b>Lack of/deficient documented evidence</b> - The required activities in the process or procedure were completed but evidence was either not, or partially, documented.
6	<b>Lack of/deficient documented evidence - Third Party/Vendor</b> - Lack of documented evidence by a third-party (e.g., vendor or through a sale or organizational transition). The required activities in the process or procedure were completed but evidence was either not, or partially, documented.
7	<b>Lack of/deficient policy/Procedure - Company Wide</b> - Ineffective management policy – high level, company-wide issue. Needs new policy/procedure/process (did not exist) or was deficient.
8	<b>Lack of/deficient policy/procedure - Department/Business Level</b> - Ineffective business-level procedure/process – Standard Operating Procedure, Instructions, department-based. Needs new policy/procedure/process (did not exist) or was deficient.
9	<b>Ineffective Preventive Controls</b> - Lack of or ineffective internal controls designed to prevent noncompliance. Detective controls were implemented but there was an ineffective or lack of preventative control (e.g., checklist, secondary reviewer, workflow, or a backup or a redundant control).
10	<b>Ineffective Validation/Detective Controls</b> - Lack of or an ineffective validation/detective control. Preventative controls were implemented but there was an ineffective or lack of a validation/detective control after completion of the task.
11	<b>Additional Training Needed</b> - Training program is adequate but additional training needed. The overall training program was adequate but training on a required task was not part of the employee's training requirements or frequency of the training was insufficient to maintain the required knowledge and skill to perform the job (e.g., did not consider the complexity of certain tasks or individual's skillset or


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# Creating a Finding: Extent of Condition and Root Cause

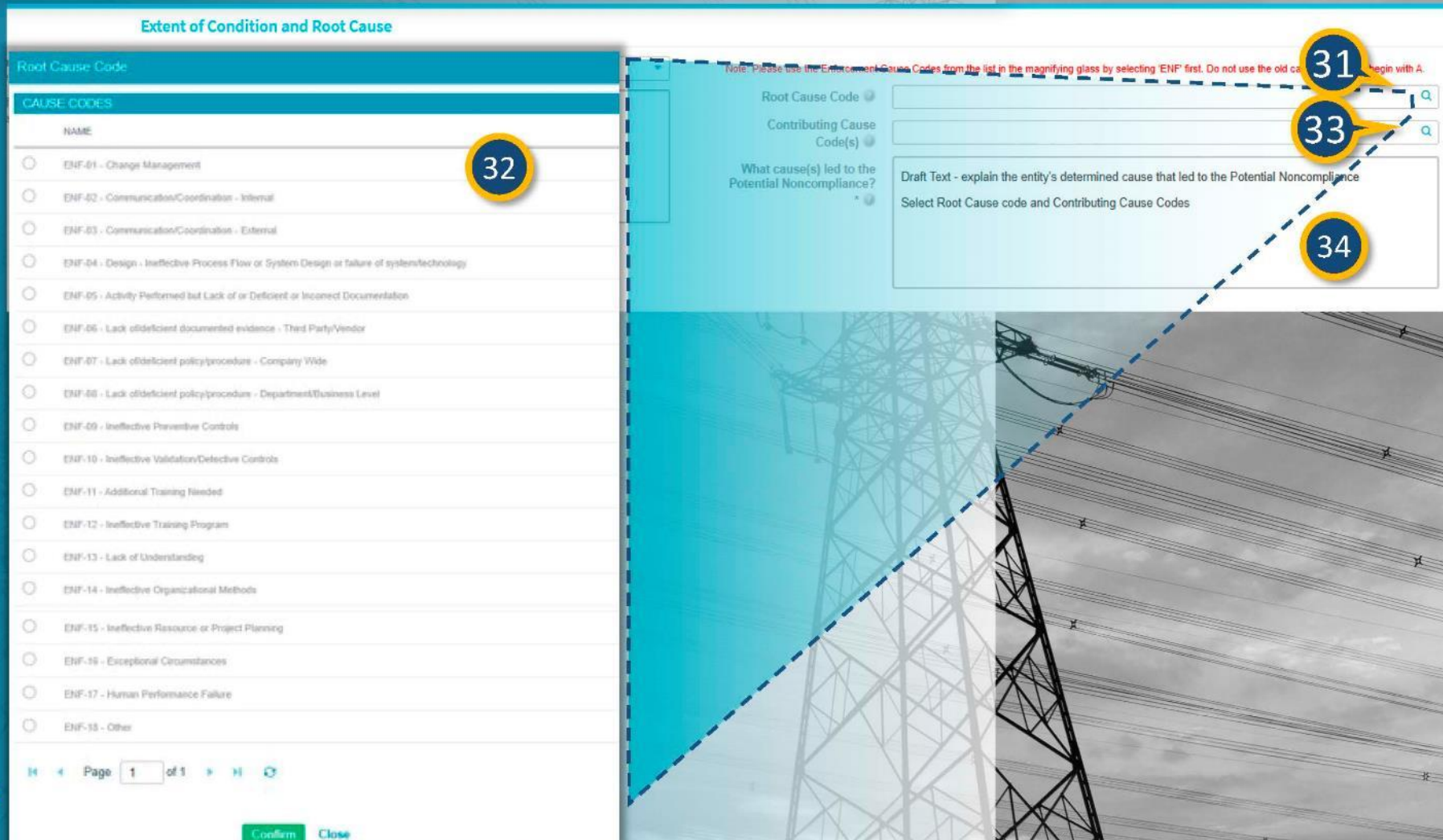


**31** The Registered Entity has the ability to note the **Root Cause Code** by clicking on the magnifying glass  to open a new Cause Code portlet

**32** Select a **Cause Code** from the list and then click **Confirm**  
*For Root Cause Code, the selection is single select.*

**33** The Registered Entity has the ability to note any **Contributing Cause Code(s)** by clicking on the magnifying glass  which will open a new portlet (same as for Root Cause Code). Select Cause Code(s) from the list and then click **Confirm**  
*For Contributing Cause Code(s), the selection is multi-select.*

**34** The Registered Entity should describe the **cause(s)** of the PNC



The screenshot shows the 'Extent of Condition and Root Cause' form. It features a 'Root Cause Code' section with a list of codes (ENF-01 to ENF-18) and a 'Contributing Cause Code(s)' section. A text area for 'Draft Text' is also present. Numbered callouts indicate the following steps:

- 31**: Points to the magnifying glass icon in the 'Root Cause Code' field.
- 32**: Points to the list of cause codes.
- 33**: Points to the magnifying glass icon in the 'Contributing Cause Code(s)' field.
- 34**: Points to the 'Draft Text' area.

At the bottom of the form, there are 'Confirm' and 'Close' buttons. The background of the form shows a blurred image of power lines and a tower.

## Selecting a Cause Code

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- ERO Enterprise consistency
- Multiple codes applicable
- Root cause vs. apparent cause
- WECC may revise code

# Top Cause Codes

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- Top five cause codes across the ERO
  - ENF-09 Ineffective Preventive Controls
  - ENF-08 Lack of or Deficient Policy/Procedure/Process—Department/Business Level
  - ENF-013 Lack of Understanding
  - ENF-10 Ineffective Validation/Detective Controls
  - ENF-11 Additional Training Needed

# Effective Internal Compliance Programs

**Ben Aldous**

*Senior Analyst, Enforcement*

**Joshua Yang**

*Enforcement Attorney*

# Internal Compliance Programs

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Policies and  
Procedures

Governance

Incident Response

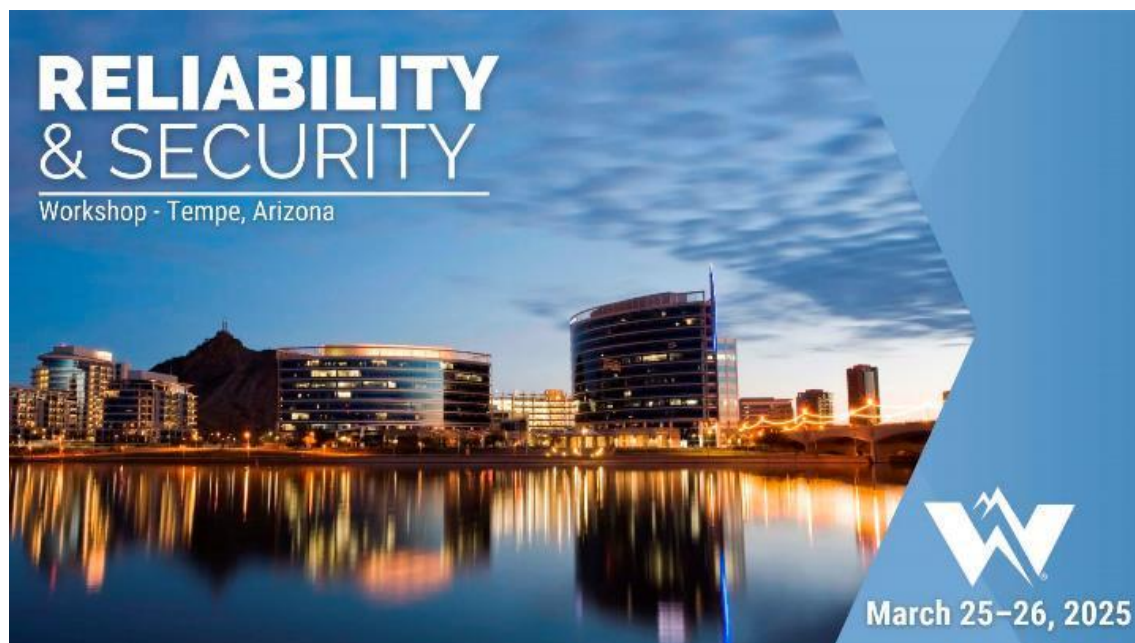
Training

Management  
Engagement

Continuous  
Improvement

Culture and Commitment

# Recent Outreach



## [March 2025 Presentation](#)



### Internal Compliance Program Self-Assessment

August 2025

An effective Internal Compliance Program (ICP) helps entities prevent and detect noncompliance and promote a culture of commitment to reliability and security. The following self-assessment is based on WECC observations during UAPL engagements. Consider these prompts when establishing and evaluating your ICP.

Effective ICPs are as diverse as the entities that adopt them. Decisions about what is appropriate for your entity will depend on many factors, including the scale and scope of your operations and your organizational structure. Each section of this self-assessment includes examples that distinguish between what may be appropriate for entities with high (HIR) or low (LIR) inherent risk and centralized (CM) or decentralized (DM) organizational models.

*This document is for informational purposes only and is not a basis for enforcement determinations.*

#### Policies and Procedures

Prompt	Examples
Do you reinforce policies and procedures with operational internal controls?	<p><b>(HIR)</b> Establish a change control based with oversight over operations technology resources. Adopt a charter or policy to establish and define the board's authority.</p> <p><b>(LIR)</b> Assign standard owners, compliance officers, or CIP Senior Managers to provide final approval of changes affecting areas of NERC compliance.</p>
Do you make documentation accessible and measure awareness?	<p><b>(CM)</b> Provide a central repository for all policies, procedures, and related documentation that is easily accessible to the appropriate staff. Include feedback mechanisms in regular training to measure awareness of the repository.</p> <p><b>(DM)</b> Ensure individual business units provide easy access for staff to relevant policies, procedures, and related documentation. Require managers to provide regular training on priority knowledge and skills.</p>

ELECTRIC RELIABILITY AND SECURITY FOR THE WEST

## [August 2025 Self-Assessment](#)

# Self-Assessment

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## Topics

- Policies and procedures
- Program governance
- Training and incentives
- Investigations and potential noncompliance
- Continuous improvement

## Examples

- By footprint size
- By organizational model



# **Reliability & Security Oversight Update**

**WECC**

**November 20, 2025  
2:00–3:00 p.m. Mountain**



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